PLANNING APPLICATIONS COMMITTEE

Wednesday, 16th November, 2022

10.00 am

Council Chamber, Sessions House, County Hall, Maidstone

Kent County Council
kent.gov.uk

AGENDA

PLANNING APPLICATIONS COMMITTEE

Wednesday, 16th November, 2022, at 10.00 am
Council Chamber, Sessions House, County Hall, Maidstone

Ask for: **Emily Kennedy**

Telephone: **03000419625**

Membership (13)

Conservative (10):	Mr A Booth (Vice-Chairman), Mr C Beart, Mrs R Binks, Mr P Cole, Mr D Crow-Brown, Mr M Dendor, Mr H Rayner, Mr O Richardson, Mr C Simkins and Mr A Weatherhead
Labour (1):	Ms J Meade
Liberal Democrat (1):	Mr I S Chittenden
Green and Independent (1):	Mr P M Harman

UNRESTRICTED ITEMS

(During these items the meeting is likely to be open to the public

A. COMMITTEE BUSINESS

1. Substitutes
2. Declarations of Interests by Members in items on the Agenda for this meeting.
3. Minutes of the meeting on 20 July 2022 (Pages 1 - 8)
4. Site Meetings and Other Meetings

B. GENERAL MATTERS

1. General Matters

C. MINERALS AND WASTE APPLICATIONS

D. DEVELOPMENTS TO BE CARRIED OUT BY THE COUNTY COUNCIL

1. GR/22/0849 - Retrospective planning permission for engineering works related to the resurfacing of the overflow car park and internal access road - Trosley Country Park, Waterlow Road, Vigo, Gravesend, Kent, DA13 0SG (Pages 9 - 26)

2. MA/22/503881 - Retrospective planning permission for engineering works related to the resurfacing of the overflow car park, Teston Bridge Country Park Car Park, Teston Lane, Maidstone, Kent, ME18 5BX (Pages 27 - 42)

E. MATTERS DEALT WITH UNDER DELEGATED POWERS

1. E1-E4 (Pages 43 - 50)

F. KCC RESPONSE TO CONSULTATIONS

1. F1 - Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent TN26 1JR (Application Reference: 22/00571/AS) (Pages 53 - 56)

2. F2 - Cradle Bridge Level Crossing Conningbrook Park, Kennington Road, Willesborough (Application Reference: 22/01041/AS) (Pages 57 - 58)

3. F3 - Charing Neighbourhood Plan - Regulation 16 Consultation (Pages 59 - 80)

4. F4 - Boughton & Dunkirk Neighbourhood Plan - Regulation 16 Consultation (Pages 81 - 88)

5. F5 - Horsmonden Neighbourhood Plan - Regulation 16 Consultation (Pages 89 - 92)

6. F6 - EIA Scoping Opinion for a proposed development for land surrounding Ebbsfleet Utd Football Club (Pages 93 - 110)

7. F7 - Supplementary Statement to the additional evidence in the Examination (Stage 1) of the Maidstone Borough Local Plan (Pages 111 - 120)

8. F8 - Folkestone and Hythe CIL Draft Charging Schedule Consultation (Pages 121 - 122)

9. F9 - Tonbridge and Malling Local Plan Regulation 18 Consultation (Pages 123 - 138)

10. F10 - Westgate-on-Sea Neighbourhood Plan Regulation 14 Consultation (Pages 139 - 302)

G. OTHER ITEMS WHICH THE CHAIRMAN DECIDES ARE URGENT

EXEMPT ITEMS

(At the time of preparing the agenda there were no exempt items. During any such items which may arise the meeting is likely NOT to be open to the public)

Benjamin Watts
General Counsel
03000 416814

Tuesday, 8 November 2022

(Please note that the draft conditions and background documents referred to in the accompanying papers may be inspected by arrangement with the Departments responsible for preparing the report.)

This page is intentionally left blank

KENT COUNTY COUNCIL

PLANNING APPLICATIONS COMMITTEE

MINUTES of a meeting of the Planning Applications Committee held in the Council Chamber, Sessions House, County Hall, Maidstone on Wednesday, 20 July 2022.

PRESENT: Mr A Booth (Vice-Chairman), Mr C Beart, Mrs R Binks, Mr I S Chittenden, Mr D Crow-Brown, Mr P M Harman, Mr H Rayner, Mr O Richardson and Mr A Weatherhead

IN ATTENDANCE: Mrs S Thompson (Head of Planning Applications), Ms M Green (Principal Planning Officer), Paul Hopkins (Principal Planning Officer), David Barton (Senior Transport Development Planner), Angela Coull (Principal Transport and Development Planner), Nagla Stevens (Principal Solicitor, Invicta Law), Emily Kennedy (Democratic Services Officer)

UNRESTRICTED ITEMS

9. Apologies
(Item)

Apologies were received from Ms J Meade, Mr P Cole, Mr M Dendor and Mr C Simkins for whom Mr A Weatherhead was present.

10. Minutes - 15 June 2022
(Item A3)

RESOLVED that the minutes of the meeting held on 15 June 2022 were correctly recorded and that they be signed by the Chair.

11. General Matters
(Item B1)

Sharon Thompson, Head of Planning Applications reported that following the referral of Application TM/21/1269 (KCC/TM/0090/2021) - Installation of a ground mounted solar photovoltaic (PV) array and associated infrastructure at Land at Offham Landfill Site, Teston Road, Offham; Infinis Solar Developments Ltd, the Secretary of State for Levelling Up, Housing and Communities had decided not to call in the application for determination. Therefore, planning permission would be granted.

12. SE/22/645 Re-cladding of existing sports hall, demolition of swimming pool building and ancillary building, and erection of single storey replacement sports and changing room facilities extension at Broomhill Bank School (Northern Site), Rowhill Road, Swanley, Kent BR8 7RP (KCC/SE/0036/2022)
(Item D1)

1) Paul Hopkins, Principal Planning Officer outlined the report and read the statement from the local Member, Mr P Cole.

2) During discussion of the application, Members agreed the addition of informatives (as detailed below at Informatives 3 and 4) relating to the landscaping scheme and the potential for heat source pumps.

3) On being put to the vote, Mr Chittenden proposed, the Chair seconded and Members RESOLVED that:

a) Permission be granted subject to the imposition of conditions covering (amongst other matters) the following:

1. The standard three year time limit;

2. The development to be carried out in accordance with the permitted details;

3. Within 3 months of the date of the decision, details of the external materials, including colour finishes, in accordance with those set out within the application shall be submitted for the approval of the County Planning Authority, and the development shall thereafter be carried out using the approved external materials;

4. The use of the development hereby permitted shall be for school use and purposes only and shall not be made available for use by the general public;

5. The measures set out in the Construction Management Strategy dated June 2022 shall be strictly adhered to for the duration of construction operations;

6. Within 3 months of the date of this decision, details of a scheme of landscaping shall be submitted for the written approval of the County Planning Authority, and such scheme shall detail all landscaping and boundary treatments including retained or additional landscaping, and shall thereafter be implemented as approved within the first planting season following completion of the works;

7. In the event of any trees, shrubs and hedges included in the landscaping scheme, approved pursuant to condition (6) above, or any replacement trees, shrubs or hedges being removed, destroyed or dying or dead within 5 years of the planting, they shall be replaced within 12 months in the same places by large nursery stock of the same species;

8. The development hereby permitted shall be carried out in such a manner as to avoid damage to any existing trees/hedges, including their root system, to be retained as part of the landscaping scheme by providing/installing tree protection;

9. Within 3 months of works commencing within the site, an ecological enhancement plan shall be submitted for the approval of the County Planning Authority, and must demonstrate how the site will be enhanced to benefit biodiversity and thereafter be implemented as approved;

10. Within 3 months of date of this decision, details of any new additional external lighting and hours of lighting operation, including the lighting of access areas, and lighting on the buildings hereby permitted, shall be submitted for the written approval of the County Planning Authority, and thereafter be implemented as approved. The external lighting scheme must adhere to the Bat Conservation Trust's 'Bats and Artificial Lighting in the UK' guidance;

b) the applicant be advised by Informative that:

1. Advice that planning permission does not convey any approval to carry out work on or affecting a public highway and that engagement with KCC Highways and Transportation would be required at an early stage.

2. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this act. Trees, scrub, hedgerows and buildings are likely to contain nesting birds between 1st March and 31st August inclusive. Buildings and vegetation are present on the application site and are to be assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity on site during this period and has shown it is absolutely certain that nesting birds are not present.

3. In preparing the landscaping scheme referred to in condition (6) above, the applicant is encouraged to provide species that have berry bearing fruit to improve the potential for biodiversity interests.

4. The developer is encouraged to explore the potential for heat source pumps as part of the sustainability credentials of the scheme.

13. GR/22/110 Proposed 2-form of entry expansion, involving the erection of a new freestanding 2-storey school building, new staff car park, new parent car park and drop off/pick up area, together with associated access, signage and landscaping works at Meopham School, Wrotham Road, Meopham, Gravesend, Kent DA13 0AH (KCC/GR/0014/2022)
(Item D2)

1) Mary Green, Principal Planning Officer outlined the report and read the statement from the local Member, Mr B Sweetland.

2) Further to questions and debate, Mr Beart proposed, the Chair seconded and Members RESOLVED that:

a) the application be referred to the Secretary of State for Levelling Up, Housing and Communities as a departure from the Development Plan on Green Belt grounds, and to consider the Sport England objection, and that SUBJECT TO his decision, and subject to the completion of a Memorandum of Understanding regarding the required monetary contribution for the School Travel Plan monitoring and Public Transport Capacity Improvements that permission be granted, subject to the imposition of conditions covering (amongst other matters) the following:

1. The standard 3 year time limit;

2. The development carried out in accordance with the permitted details;

3. The development to be carried out using external materials and colour finishes as specified within the planning application documents, unless otherwise agreed;

4. The submission and approval of the details of the Photovoltaic PV panels and any roof plant.

5. Details of external lighting, including times and days of operation and details of the timer and light sensor to be installed;

6. Any lighting proposals shall follow the recommendations within the Bats and Artificial Lighting in the UK document produced by the Bat Conservation Trust and Institution of Lighting Professionals;

7. Prior to and during construction works the precautionary mitigation for dormouse, badgers and breeding birds within the Preliminary Ecological Appraisal (Sevenoaks Environmental Consultancy. April 2021) shall be implemented as detailed;

8. Prior to and during construction works the habitat creation and reptile mitigation works within the Additional Ecological Assessment (Sevenoaks Environmental Consultancy. May 2022) shall be implemented as detailed;

9. On completion of the reptile mitigation works detailed in condition 7 (above) the grasslands must be managed as detailed in the Proposed Enhancement and Mitigation Plan within the Additional Ecological Assessment (Sevenoaks Environmental Consultancy. May 2022) shall be implemented as detailed;

10. An Impact Assessment and Conservation Payment Certificate signed by Natural England shall be submitted to the County Planning Authority for written approval. No works can commence on site until the applicant has received the full District Level Licence;

11. Measures to protect the existing trees during construction;

12. The implementation and maintenance of the Landscaping Scheme,

13. No tree removal during the bird breeding season;

14. No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of archaeological field evaluation works in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the County Planning Authority and following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the County Planning Authority;

15. No development shall take place until a Construction Management Plan, including lorry routing, access, parking, construction vehicle loading/unloading and circulation within the site for contractors and other vehicles related to construction operations, measures to prevent mud and debris being taken onto the public highway, the erect of heras fencing adjacent to the retained reptile habitat, has been submitted for approval and thereafter shall be implemented as approved;

16. Hours of working during construction to be restricted to between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays;

17. A minimum of 10% of the new staff parking spaces (excluding the drop-off / pick1up spaces) shall be provided with Electric Vehicle charging points. In addition, a further 20% of the new spaces (excluding the drop-off / pick-up spaces) shall be provided with passive service i.e. ducting / cabling only). Details and location of these shall be submitted and approved by the County Planning Authority prior to first occupation of the new buildings;

18. The annual review of the School Travel;

19. Travel Surveys of both staff and pupils to be undertaken annually in accordance with the submitted School Travel Plan (via the Jambusters website) and compared to the targets given. Any further mitigating measures, if the targets are not met, to be submitted to and approved by the County Planning Authority. Any identified shortfall in the bus services to be appropriately addressed in accordance with the submitted MOU regarding provision of bus services;

20. The Car Park Management Plan is to be monitored and reviewed annually as part of the annual School Travel Plan review;

21. The revised internal road layout and bus stopping / turning area to be completed prior to first occupation;

22. The proposed drop-off / pick-up area as shown on the submitted plans to be completed and fully operational prior to first occupation of the new buildings;

23. The submitted Car Park Management Plan to be reviewed annually in coordination with other on-site operators and any amendments to be submitted and approved by the County Planning Authority;

24. The car parking spaces as shown on the submitted drawings shall be provided prior to first occupation and shall thereafter be maintained for that sole purpose;

25. A minimum of 20 secure and weatherproof cycle parking spaces shall be provided prior to first occupation in accordance with details to be submitted to and approved by the County Planning Authority and shall be maintained thereafter, and with an area safeguarded on the site to allow for the future addition of further cycling parking, if required. The number of cycle parking spaces shall be review annually alongside the School Travel Plan and the number of spaces increased if necessary;

26. If, during development, contamination not previously identified is found to be present at the site then no further development unless otherwise agreed in writing with the County Planning Authority shall be carried out until a remediation strategy detailing how this contamination would be dealt with has been submitted to and approved in writing by the County Planning Authority. The remediation strategy shall be implemented as approved;

27. No infiltration of surface water drainage into the ground is permitted other than with the written approval of the County Planning Authority. The development shall be carried out in accordance with the approved details;

28. Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to and approved in writing by the County Planning Authority. The detailed drainage scheme shall be based upon the Flood Risk Assessment prepared by CTP dated 13 January 2022 and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site;

29. No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system, and prepared by a suitably competent person, has been submitted to and approved by the County Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed;

30. Before the first use/occupation of the development hereby permitted, details regarding the proposed community use of the School's indoor sports facilities and school hall, shall be submitted to and approved in writing by the County Planning Authority, including type of use, hours of use, management of access by non-school users and use of the on-site car parking; and

31. The removal of the temporary modular buildings related to the 2FE expansion.

14. Matters dealt with under delegated powers
(Item E1)

RESOLVED to note matters dealt with under delegated powers since the meeting on 15 June 2022 relating to:-

E1 County matter applications
E2 County Council developments
E3 Screening Opinions under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017
E4 Scoping Opinions under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017

15. Paddock Wood Neighbourhood Plan (2022-2038) - Regulation 14 Consultation
(Item F1)

RESOLVED to note Kent County Council's response to the Regulation 14 Consultation on Paddock Wood Neighbourhood Plan (2022-2038).

(a) **FIELD**
(b) **FIELD_TITLE**

This page is intentionally left blank

SECTION D
DEVELOPMENT TO BE CARRIED OUT BY THE COUNTY COUNCIL

Background Documents: the deposited documents; views and representations received as referred to in the reports and included in the development proposals dossier for each case; and other documents as might be additionally indicated.

Item D1

Retrospective planning permission for engineering works related to the resurfacing of the overflow carpark and internal access road at Trosley Country Park, Waterlow Road, Vigo Village, Gravesend, Kent DA13 0SG - GR/22/0849 (KCC/GR/0140/2022)

A report by Head of Planning Applications Group to Planning Applications Committee on 16th November 2022.

Application by Kent County Council (Country Parks) for retrospective planning permission for engineering works related to the resurfacing of the overflow car park and internal access road at Trosley Country Park, Waterlow Road, Vigo Village, Gravesend - GR/22/0849 (KCC/GR/0140/2022)

Recommendation: Permission be granted.

Local Member: Mr B Sweetland Classification: Unrestricted

Site

1. Trosley Country Park is located to the eastern side of the A227 Gravesend Road, within the village of Vigo. The Country Park is one of Kent County Council's Country Parks and covers 170 acres of woodland and chalk downland. The Park crosses the boundary between the parish of Vigo in the Borough of Gravesham to the north, and the parish of Trottiscliffe in the Borough of Tonbridge and Malling to the south. The site is accessed via Waterlow Road to the north and is located wholly within the Metropolitan Green Belt and the Kent Downs Area of Outstanding Natural Beauty (AONB). The Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI) covers the southern area of Trosley Country Park and is located approximately 40 metres south of the area of development. The development area is also situated between two areas of Ancient Woodland.

2. The Country Park comprises an existing main carpark and amenity block to the north west of the site, which provides visitor facilities including a café, public toilets, classroom/function room and storage area. The park also includes an overflow carpark, play/activity areas and a variety of waymarked trails of varying distance and difficulty. The area of engineering and resurfacing works relates to the existing overflow carpark and internal access road, situated to the east of the existing amenity block, as well as the provision of a new footpath from the overflow carpark to the visitor centre. The area of development is located within the parish of Vigo, Gravesham, adjacent to the access road to the Country Park. A site location plan is attached.

Retrospective planning permission for engineering works related to the resurfacing of the overflow carpark and internal access road - Trosley Country Park, Waterlow Road, Vigo Village, Gravesend - GR/22/0849 (KCC/GR/0140/2022)

Recent Planning History

3. Prior to Kent County Council operating the facility, the site was part of a large woodland estate known as Trosley Towers. Kent County Council bought and opened the Country Park in 1976. In 2004 an amenity block was built providing facilities for visitors.

4. The most relevant recent site planning history is listed below:

GR/18/930	Timber framed extension to provide additional office space Granted with conditions 20 December 2018
GR/10/862	Replacement visitor centre for Trosley Country Park. Granted with conditions 13 October 2010
GR/10/862/R	Non-material amendment to permitted drawings including provision of a servery hatch, changes to external doors, windows, decking area and wood stores and details of flue to boiler. Details approved 11 April 2011
GR/10/862/R3,R4&R5	Details pursuant to conditions 3 (foul & surface water drainage), 4 (external lighting) and 5 (archaeological watching brief) of planning permission KCC/GR/0261/2010 for a replacement visitor centre. Details approved 11 April 2011
GR/03/1052	New amenity block providing male, female staff and disabled toilets, staff restroom and equipment store. Granted with conditions 27 January 2004
GR/03/1052/R	Minor amendment to elevation drawing, comprising changes to roof to external covered area adjacent to amenity block permitted under planning permission GR/03/1052. Details approved 10 April 2008
GR/03/1052/R2	Amendments to planning permission reference GR/03/1052. Approved 2 November 2004

Proposal

5. This planning application seeks retrospective planning permission for engineering works related to the resurfacing of the existing overflow carpark and internal access road, along with the provision of a new informal footpath at Trosley Country Park (country park) to provide safe and usable access during all weather conditions.

6. The site previously comprised a 60 space overflow carpark, situated east of the main carpark and visitor centre and south of Waterlow Road, which consisted of made ground. The site also included an internal access road, situated west of the overflow

carpark, running east/west from the overflow carpark to the visitor centre, which was previously surfaced with tarmac.

7. This application seeks retrospective planning permission for the resurfacing of the existing overflow carpark and the internal access road along with the provision of a informal new footpath. The areas have been levelled with a shallow camber/gradient of around 1:200 and resurfaced with a heavy duty geotextile permeable membrane, covered with 150mm of MOT type 1 road surfacing, compacted with a 50mm wearing course of granite/limestone dusting. The retrospective application also includes the installation of sleepers along all edges of the overflow carpark.

8. The area of resurfacing totals some 2,863 square metres and extends partially southwards from the access road into the country park from Waterlow Road, and then spanning east and westwards parallel to Waterlow Road. The development area extends eastwards over the overflow carpark, leading towards the existing play area, as well as westwards covering the internal access road which leads from the country park entrance to the main carpark and visitors centre. The resurfacing also includes the access road at the far end of the overflow carpark which leads to the play area, as well as part of a Public Right of Way, situated east of the main vehicular access road, extending northwards from the overflow carpark to Waterlow Road.

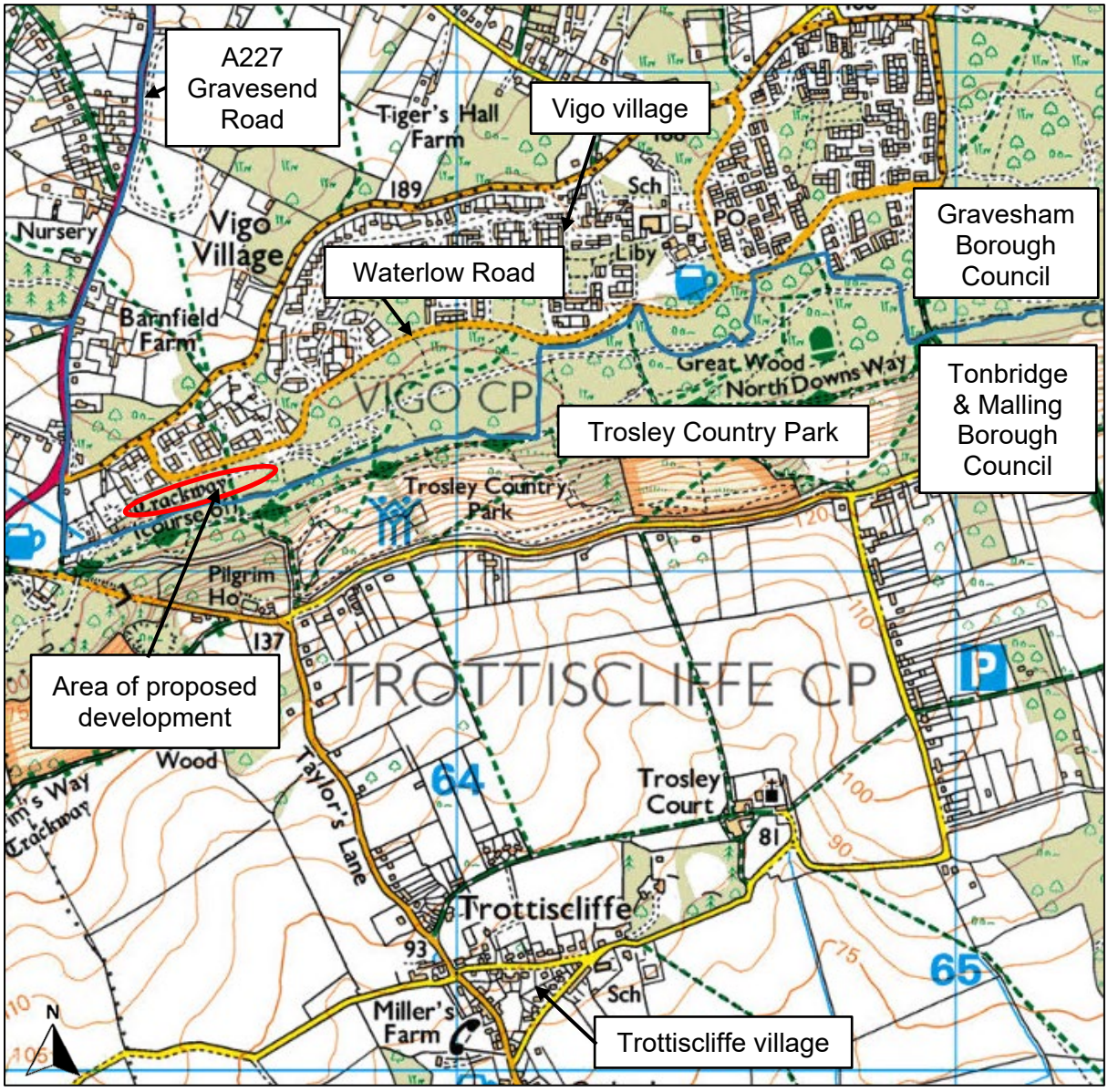
9. The application also includes the installation of a new footpath which begins just south of the main vehicular entrance via Waterlow Road, located along the southern edge of the internal access road which runs westwards from the overflow carpark to the main carpark and visitor centre. The path is surfaced in the same materials as the overflow carpark and internal access road as outlined in paragraph 7.

10. Other related works carried out under statutory permitted development rights, and therefore not part of this application, include the installation of a 110mm knee rail wooden fence along the boundary between the internal access road and new footpath leading from the overflow carpark to the visitors centre, as well as the installation of a metal gate at the entrance to the play area at the eastern end of the overflow carpark to restrict vehicles accessing the play area.

11. The existing vehicular and pedestrian access points and routes into and out of the country park from Waterlow Road to the north have been retained. The area of resurfacing relates to the existing overflow carpark and internal access road, and no tree or vegetation clearance was required to facilitate the development.

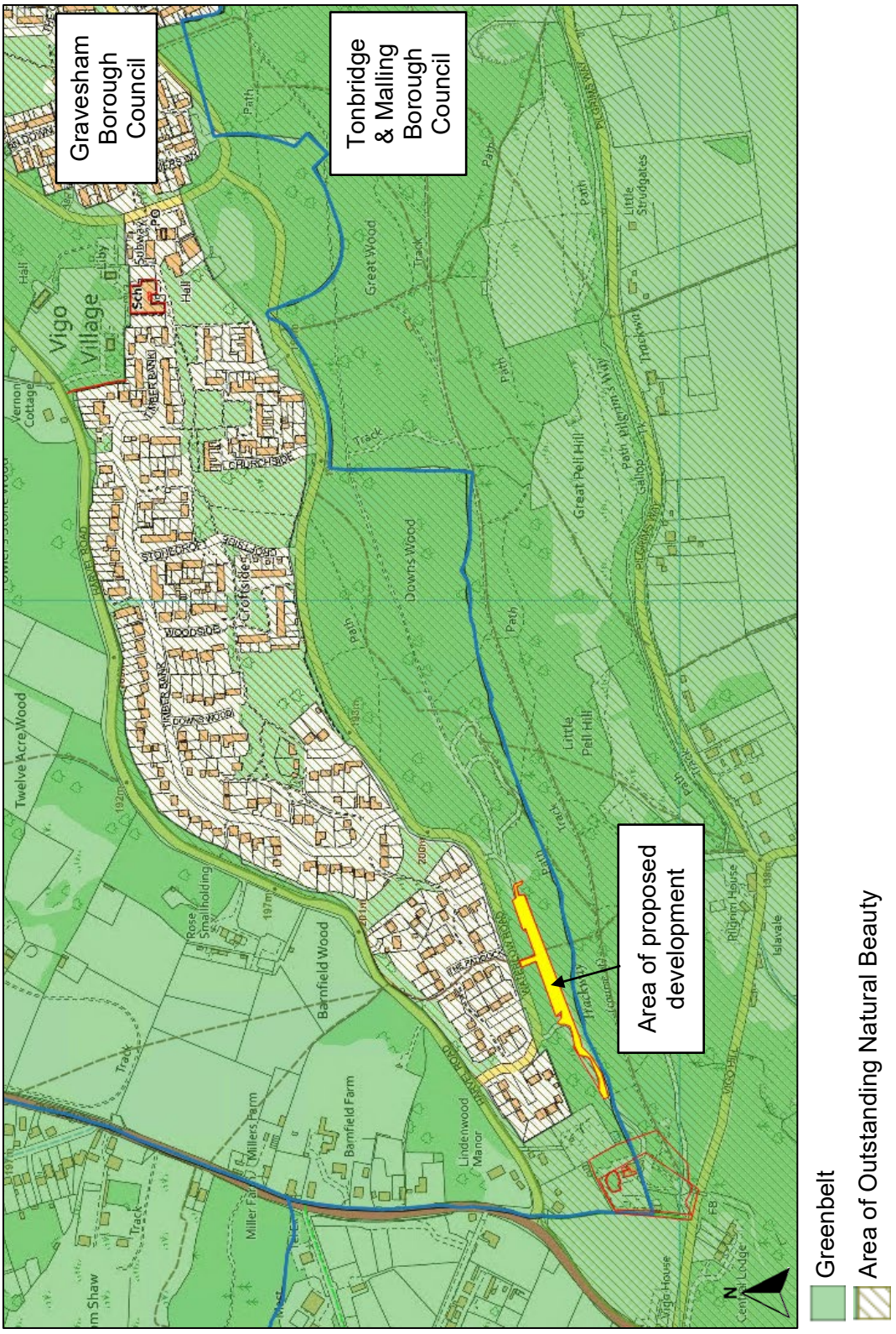
Retrospective planning permission for engineering works related to the resurfacing of the overflow carpark and internal access road - Trosley Country Park, Waterlow Road, Vigo Village, Gravesend - GR/22/0849 (KCC/GR/0140/2022)

Site Location Plan



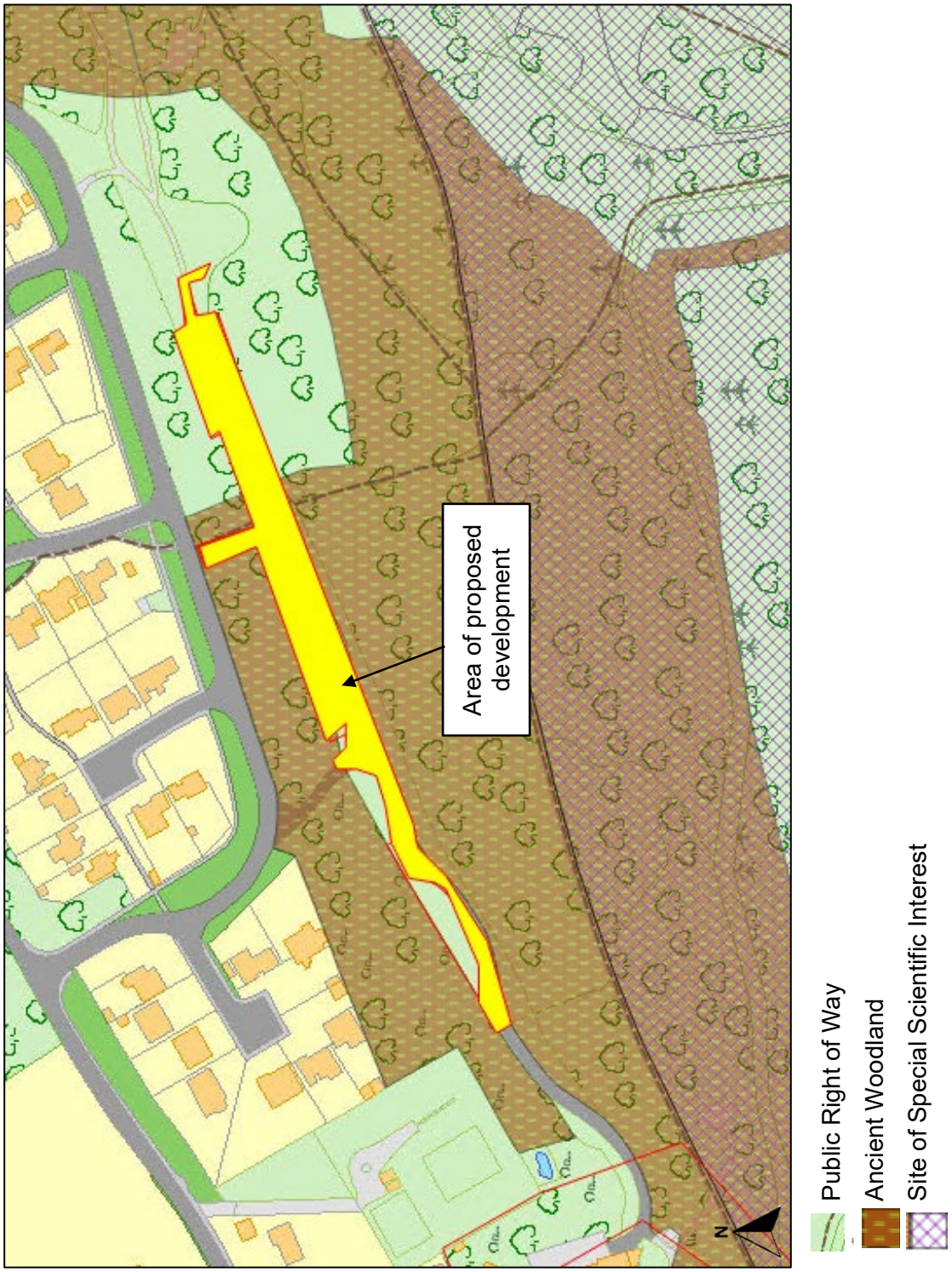
Retrospective planning permission for engineering works related to the resurfacing of the overflow carpark and internal access road - Trosley Country Park, Waterlow Road, Vigo Village, Gravesend - GR/22/0849 (KCC/GR/0140/2022)

Greenbelt and AONB map



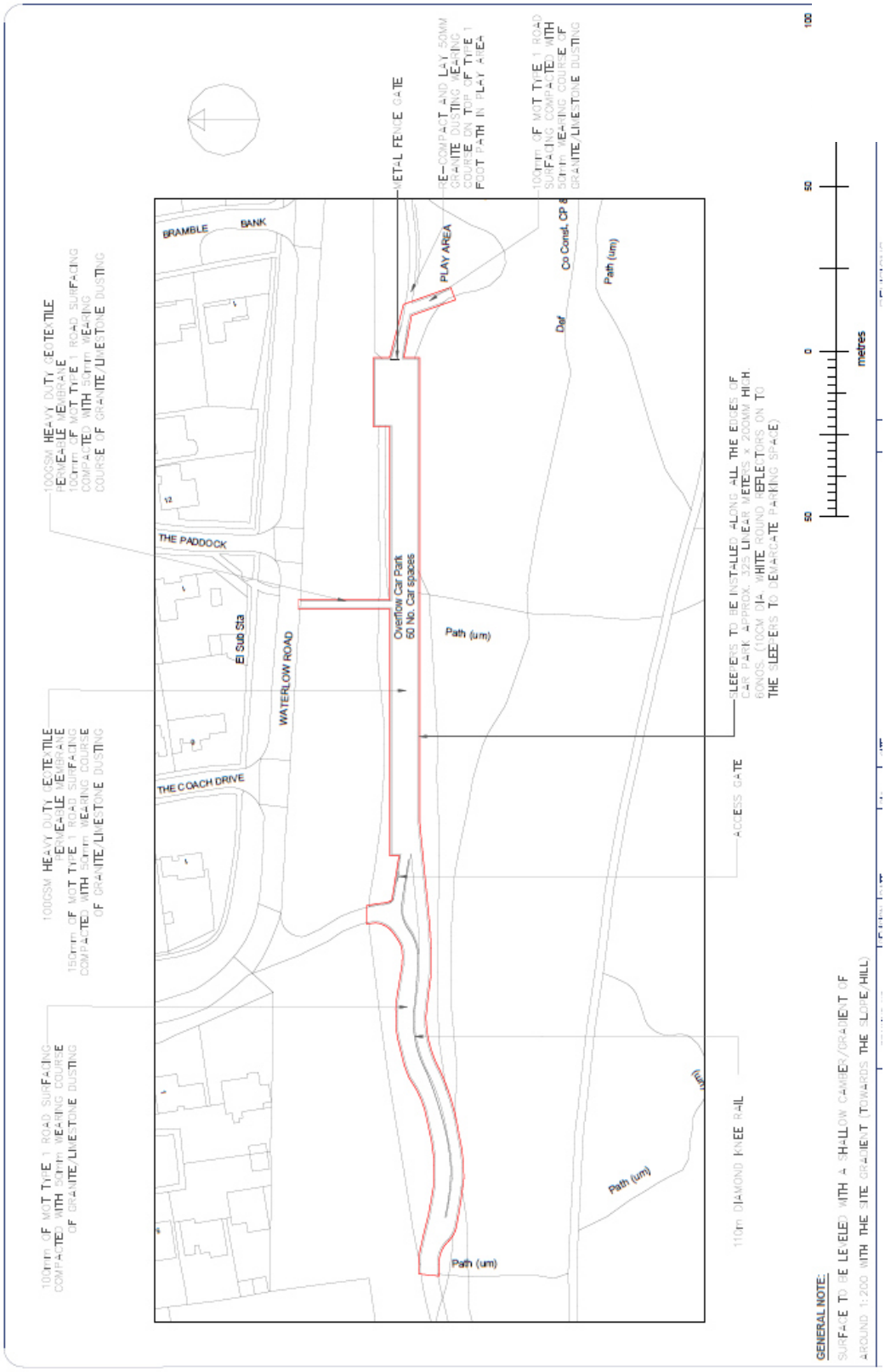
Retrospective planning permission for engineering works related to the resurfacing of the overflow carpark and internal access road - Trosley Country Park, Waterlow Road, Vigo Village, Gravesend - GR/22/0849 (KCC/GR/0140/2022)

Site of Special Scientific Interest (SSSI),Ancient Woodland and PROW map



Retrospective planning permission for engineering works related to the resurfacing of the overflow carpark and internal access road - Trosley Country Park, Waterlow Road, Vigo Village, Gravesend - GR/22/0849 (KCC/GR/0140/2022)

Proposed Site Plan



Retrospective planning permission for engineering works related to the resurfacing of the overflow carpark and internal access road - Trosley Country Park, Waterlow Road, Vigo Village, Gravesend - GR/22/0849 (KCC/GR/0140/2022)

Trosley Country Park Overflow Carpark before resurfacing

Trosley Country Park Overflow Carpark after resurfacing

Retrospective planning permission for engineering works related to the resurfacing of the overflow carpark and internal access road - Trosley Country Park, Waterlow Road, Vigo Village, Gravesend - GR/22/0849 (KCC/GR/0140/2022)

Trosley Country Park overflow carpark and internal access road after resurfacing

Retrospective planning permission for engineering works related to the resurfacing of the overflow carpark and internal access road - Trosley Country Park, Waterlow Road, Vigo Village, Gravesend - GR/22/0849 (KCC/GR/0140/2022)

Planning Policy

12. The most relevant Government Guidance and Development Plan Policies summarised below are appropriate to the consideration of this application:

(i) **National Planning Policy Framework (NPPF) July 2021** and the **National Planning Policy Guidance** (March 2014), sets out the Government's planning policy guidance for England, at the heart of which is a presumption in favour of sustainable development. The guidance is a material consideration for the determination of planning applications but does not change the statutory status of the development plan which remains the starting point for decision making. However, the weight given to development plan policies will depend on their consistency with the NPPF (the closer the policies in the development plan to the policies in the NPPF, the greater the weight that may be given).

In determining applications, the NPPF states that local planning authorities should approach decisions in a positive and creative way, and decision takers at every level should seek to approve applications for sustainable development where possible.

In terms of delivering sustainable development in relation to this development proposal, the NPPF guidance and objectives covering the following matters are of particular relevance:

- Providing accessible services and open spaces that reflect current and future needs and support communities health, social and cultural well-being (paragraph 8);

- Achieving healthy, inclusive and safe places which are safe and accessible and encourage active and continual use of public areas and enable and support healthy lifestyles (paragraph 92);

- Provide social, recreational and cultural facilities the community needs (paragraph 93);

- Provide access to a network of high-quality open spaces and opportunities for sport and physical activity for the health and well-being of communities (paragraph 98);

- Achieving the requirement for high quality design, creating places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users (paragraph 130);

- Provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor recreation as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it (paragraph 149);

- Contributing to and enhancing the natural and local environment by protecting and enhancing sites of biodiversity (paragraph 174);

- Great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues (paragraph 176);

- Consideration of the likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest (paragraph 180);

- Consideration of any development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland (paragraph 180).

(ii) **Gravesham Local Plan Core Strategy 2014**

Policy CS01 **Sustainable Development**
Seeks to achieve sustainable development whereby planning applications that accord with the Development Plan will be approved without delay unless material considerations indicate otherwise. The Policy states that the Borough Council will take a positive approach reflecting the presumption in favour of sustainable development in the NPPF and the Core Strategy and work proactively with applicants to find solutions which mean that proposals can be approved wherever possible and to secure development that improves the economic, social and environmental conditions in the area.

Policy CS02 **Scale and Distribution of Development**
Seeks to prioritise development in the urban area as a sustainable location for development and supports developments inset from the Green Belt.

Policy CS10 **Physical and Social Infrastructure**
Supports proposals and activities that protect, retain or enhance existing physical and social infrastructure or lead to the provision of additional infrastructure that improves community well-being.

Policy CS11 **Transport**
Seeks to ensure that the impact of proposals on the highway and public transport network is managed and that there is sufficient new parking in new development in accordance with adopted parking standards.

Policy CS12 **Green Infrastructure**
Seeks to ensure landscape character and valued landscapes are conserved, restored and enhanced, with the greatest weight given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs Area of Outstanding Natural Beauty and its setting.

Policy CS19 **Development and Design Principles**
Seeks to manage development and design principles to achieve

visually attractive, fit for purpose and locally distinctive new development, which conserves and enhances the character of the local built, historic and natural environment, integrates well with the surrounding local area and meets anti-crime standards.

(iii) **Gravesham Local Plan First Review Saved Policies 2014**

Policy P3 **Policy for Vehicle Parking Standards**
Seeks to ensure that there is provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception. All vehicle parking provision should normally be made on the development site.

Consultations

13. **Gravesham Borough Council:** Raise no objection to the application and request that Kent County Council determines the application in accordance with the adopted local and national planning policy.

Tonbridge and Malling Borough Council: Raise no objection to the application.

Vigo Parish Council: Raise no objection to the application.

Trottiscliffe Parish Council: Raise no objection to the application.

Kent Downs Area of Outstanding Natural Beauty Unit: Note that the works have taken place within an area of Ancient Woodland, which may be affected by the development. Ancient woodlands are irreplaceable and have great value because they have a long history of woodland cover. Outline that it is Government policy to refuse development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "there are wholly exceptional reasons and a suitable compensation strategy exists" (National Planning Policy Framework paragraph 180). One of the most important features of ancient woodlands is the quality and inherent biodiversity of the soil; they are relatively undisturbed physically or chemically. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). The Kent Downs AONB Management Plan identifies as an aim in the Woodland and Trees section that 'The irreplaceable fine tree and ancient woodland characteristics and qualities, cultural heritage and landscape character is restored, conserved and enhanced.' Therefore consider it essential that any impacts on the Ancient Woodland are considered appropriately when assessing the application.

Public Rights of Way: No comments received.

KCC Highways and Transportation: Raise no objection to the application and advise that there are no highways implications associated with the proposal.

KCC Biodiversity: Raise no objection and note that the application is retrospective meaning the works have already been carried out. The KCC Biodiversity Officer advises

that it is unlikely that ecological information would have been requested to be submitted as part of this application as it appears that only sparce sections of vegetation would have been cleared to facilitate the works. Biodiversity may however have recommended that a precautionary approach was utilised to clear the vegetation to ensure that protected/notable species were not killed or injured during the works. The Biodiversity Officer goes on to explain that the Country Park is within the Halling to Trottiscliffe Escarpment SSSI and Brimp/Fowles/Round Ancient Woodland, however as the site was already part of the overspill car park and compacted ground it is very unlikely that features associated with the SSSI would have been impacted by the works.

Local Member

14. The local County Council Member for Gravesham Rural, Mr Bryan Sweetland, was notified of the application on 1 August 2022. No views have been received to date.

15. The local County Council Member for Malling North, Sarah Hohler, was also notified of the application on 1 August 2022 due to the southern part of the Country Park being located within the district of Tonbridge and Malling. No views have been received to date.

Publicity

16. The application was publicised by the posting of a total of 5 site notices in the vicinity of the Country Park, including at the front of the Country Park entrance, on the Country Park notice board and along the area of development. There are no properties within the immediate vicinity of the application site. A press notice was also published in the local newspaper on 11 August 2022.

Representations

17. No letters of representation have been received to date.

Discussion

18. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 12 above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Therefore, the proposal needs to be considered in the context of the Development Plan Policies, Government Guidance and other material planning considerations arising from consultation and publicity. In my opinion, the key material planning considerations in this particular case relate to the acceptability of the development given its location within the Metropolitan Green Belt, and the associated impacts arising from the proposal in terms of the Kent Downs Area of Outstanding Natural Beauty (AONB) designation, the siting, design and justification of the proposed development and potential ecological and arboricultural impacts, particularly on the nearby Ancient Woodland.

19. The planning authority has not received any objection to this application. On that basis, an application would normally be determined under powers delegated to the Head of Planning Applications. In this instance however, the application is required to be reported to the Planning Applications Committee as a result of governance requirements arising from the applicant, Kent Country Parks, and the Planning Applications Group both falling within the current management arrangement of the Growth and Communities Division of the Growth, Environment and Transport Directorate. In these circumstances, legislation requires that the decision is taken by the Planning Applications Committee even though there are no material planning objections to the proposal.

20. The application is retrospective. The applicant was under the impression prior to the works taking place that the development benefited from permitted development rights and that a planning application was not necessary. Once the applicant was aware that planning permission was required, it submitted this application to test the planning merits of the proposal.

Principle of Development in the Green Belt and Area of Outstanding Natural Beauty

21. The proposed area of development is situated within the Metropolitan Green Belt and the Kent Downs Area of Outstanding Natural Beauty. Policies in the NPPF and Gravesham Borough Council Core Strategy seek to preserve the openness within the Green Belt and to give great weight to conserving and enhancing the landscape and scenic beauty of the AONB.

22. In terms of the Metropolitan Green Belt, consideration needs to be given as to whether the development would be classified as 'inappropriate'. The NPPF sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

23. The NPPF states that construction of new buildings should be regarded as inappropriate within the Green Belt, although a number of limited exceptions are identified. Paragraph 149 b) of the NPPF lists the following as an exception:

> *'the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it'*

24. Given the proposed development relates to the engineering and resurfacing works of an existing open space previously consisting of both tarmac and made ground, and that the proposed development would be maintaining the previous use within the country park, constructed of materials to match the existing and tie into the surrounding environment, I can see no reason why the proposal would affect the openness of the Green Belt. The proposal would also maintain the use of the land to provide access to outdoor recreation and the facilities would preserve the openness of the Green Belt and would therefore not be considered as 'inappropriate development'.

25. No objection has been raised on Green Belt grounds by the District Authority and I consider that the proposed development would not conflict with the NPPF guidance or

Policy CS02 of the Gravesham Local Plan Core Strategy (2014) and is acceptable in principle.

26. The designation for the Kent Downs Area of Outstanding Natural Beauty includes the whole of Trosley Country Park. The proposed area of resurfacing would have a very limited impact on the wider landscape and setting of the AONB given that it is a small proportion of the county park and would only be seen from limited view points from within the country park itself. The proposed materials for the resurfacing include a type 1 road surfacing compacted with a course of granite/limestone dusting and it is considered that the materials would tie in with the surrounding environment. The development is also well screened to areas outside the country park by existing vegetation including dense woodland, hedgerows, and mature trees. Paragraph 176 of the NPPF outlines that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. I am satisfied that the resurfacing of the existing overflow parking area and associated internal access road and informal footpath as proposed would not adversely affect the landscape and scenic beauty of the AONB, nor its setting. Neither the Kent Downs AONB Unit or the Borough Council have raised any concerns about the impacts of the proposals on the AONB and I consider that the proposal accords with the general principles contained in Gravesham Local Plan Core Strategy (2014) Policy CS12: Green Infrastructure.

Siting, Design and Justification for the Development

27. This application seeks retrospective planning permission for engineering works related to the resurfacing of the existing overflow carpark and internal access road, along with the provision of a new informal footpath at Trosley Country Park. The engineering works and surfacing are proposed on existing open areas within the woodland of the country park that have previously been used as an overflow carpark, which comprised made ground, and an internal access road which consisted of tarmac. The applicant states that the resurfacing of these areas would provide safer and more inclusive accessible access into the country park during all weather conditions. Considering the previous use and location within the open woodland within the country park, I am satisfied that the proposed location of the engineering and resurfacing works is considered appropriate in this instance. .

28. The resurfacing materials include a heavy-duty geotextile permeable membrane surface including 150mm of MOT type 1 road surfacing compacted with 50mm wearing course of granite/limestone dusting. Due to the application being retrospective, the works have already taken place on site and, as shown in the photographs earlier in the report, the resurfacing provides a grey coloured finish with wooden sleepers along the edges and a wooden fence. I am satisfied that the proposed materials are appropriate given the location within the country park and would be in keeping with the surrounding area. The proposal would accord with the NPPF objectives on design and Gravesham Local Plan Core Strategy (2014) Policy CS19: Development and Design Principles.

29. Trosley Country Park attracts many visitors each year and the application documents set out that the overflow carpark assists in meeting the needs of the visitors and easing congestion around the park during busy periods. The resurfacing of the existing overflow carpark and internal access road would enable the carpark to be used all year round and

be accessible in all weather conditions. Similarly, the new footpath is intended to provide a safer and more accessible and safer route for visitors from the overflow carpark to the visitors centre. The planning application seeks to retain the existing vehicular and pedestrian access points and routes into and out of the country park from Waterlow Road and I consider that these access routes would be enhanced as a result of the resurfacing works.

Ecological and Arboricultural Interests

30. The southern part of Trosley Country Park is located within the Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI). The SSSI is designated due to the site consisting of an extensive area of the North Downs west of the Medway Gap and forming a complex of chalk grassland and beech woodland. The proposed development is located approximately 40 metres north of the SSSI, with significant existing woodland in between. The area of resurfacing is also surrounded by two areas of Ancient Woodland, although the development site is not within this designation. It should be noted that due to the works to resurface an existing overflow carpark, comprising made ground, and internal access road consisting of tarmac, the development would not have required the removal any existing trees and/or vegetation.

31. The Kent Downs AONB Unit has noted that the works have taken place within an area of Ancient Woodland, which may be affected by the development. The AONB Unit sets out that Ancient Woodland is irreplaceable and has great value due to a long history of woodland cover, with a particularly important feature being the quality and inherent biodiversity of the soil and advise that it is essential that any impacts on the Ancient Woodland are considered appropriately when assessing the application. NPPF paragraph 180 sets out that development resulting in the loss or deterioration of irreplaceable habitats, such as ancient woodland, should be refused unless there are wholly exceptional reasons and a suitable compensation strategy.

32. KCC Biodiversity were consulted on the application and were satisfied that, whilst the application is retrospective and therefore the works have already been carried out, it is unlikely that ecological information would have been requested to be submitted as part of the application. The Biodiversity Officer outlined that the country park is located within the Halling to Trottiscliffe SSSI and Brimp/Fowles/Round Ancient Woodland, however as the site was already part of the overflow carpark and made of compacted ground, it is very unlikely that the features associated with the SSSI would have been impacted by the works. The Applicant has also confirmed that the resurfacing is of existing paths and carparking within Trosley Country Park, and there was no tree or vegetation removal or clearance required to facilitate the works. There has therefore been no loss of the Ancient Woodland. I am therefore satisfied that the proposed development would not have a significant adverse impact on the SSSI, Ancient Woodland or other ecological interests and is therefore in accordance with development plan policy. There are no further works to take place.

Conclusion

33. The proposal seeks retrospective planning permission for engineering works related to the resurfacing of the existing overflow carpark and internal access road, along with the

provision of a new informal footpath at Trosley Country Park. The Country Park is located within the Metropolitan Green Belt and within the Kent Downs Area of Outstanding Natural Beauty (AONB). The area of development is also in close proximity to Ancient Woodland and is situated approximately 40 metres north of the Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI). In my view, the siting and design of the resurfacing is acceptable, and would not have any significant impact on the openness of the Green Belt or any adverse impact on the AONB. I am also satisfied that the development would not have an adverse impact on the SSSI or Ancient Woodland.

34. There are no material planning objections to this application. On that basis, applications would normally be determined under powers delegated to the Head of Planning Applications. In this instance however, the application is required to be reported to the Planning Applications Committee as a result of governance requirements arising from the applicant, Kent Country Parks, and the Planning Applications Group both falling within the current management arrangement of the Growth and Communities Division of the Growth, Environment and Transport Directorate.

35. The development is in accordance with the general aims and objectives of the relevant Development Plan Policies and the principles of the National Planning Policy Framework and therefore my recommendation is that planning permission be granted.

Recommendation

36. I RECOMMEND that PERMISSION BE GRANTED.

Case Officer: Chloe Miles	Tel. no: 03000 415718

Background Documents: see section heading

Item D2

Retrospective planning permission for engineering works related to the resurfacing of the overflow car park at Teston Bridge Country Park Car Park, Teston Lane, Maidstone, Kent, ME18 5BX - MA/22/503881 (KCC/MA/0141/2022)

A report by Head of Planning Applications Group to Planning Applications Committee on 16 November 2022

Application by KCC Country Parks for retrospective planning permission for engineering works related to the resurfacing of the overflow car park at Teston Bridge Country Park Car Park, Teston Lane, Maidstone, Kent, ME18 5BX - MA/22/503881 (KCC/MA/0141/2022)

Recommendation: Permission be granted subject to conditions.

Local Member: Mr Simon Webb Classification: Unrestricted

Site

1. Teston Bridge Country park is located in the village of Teston in the west of the Maidstone Borough. The site area totals approximately 32 acres and is comprised of three meadows; Bridge Meadow to the north-east which is a picnic area, and Tutsham Meadow and Coombe Hill to the south west which are used for cattle grazing. The site has several walking routes throughout, including the Medway Footpath which runs along the River Medway surrounding the east and south of the site which is a Public Right of Way. The country park is used by members of the public for out-door activities including dog walking, fishing and picnicking; the site also offers a children's play area, toilets and a food and drink facility.

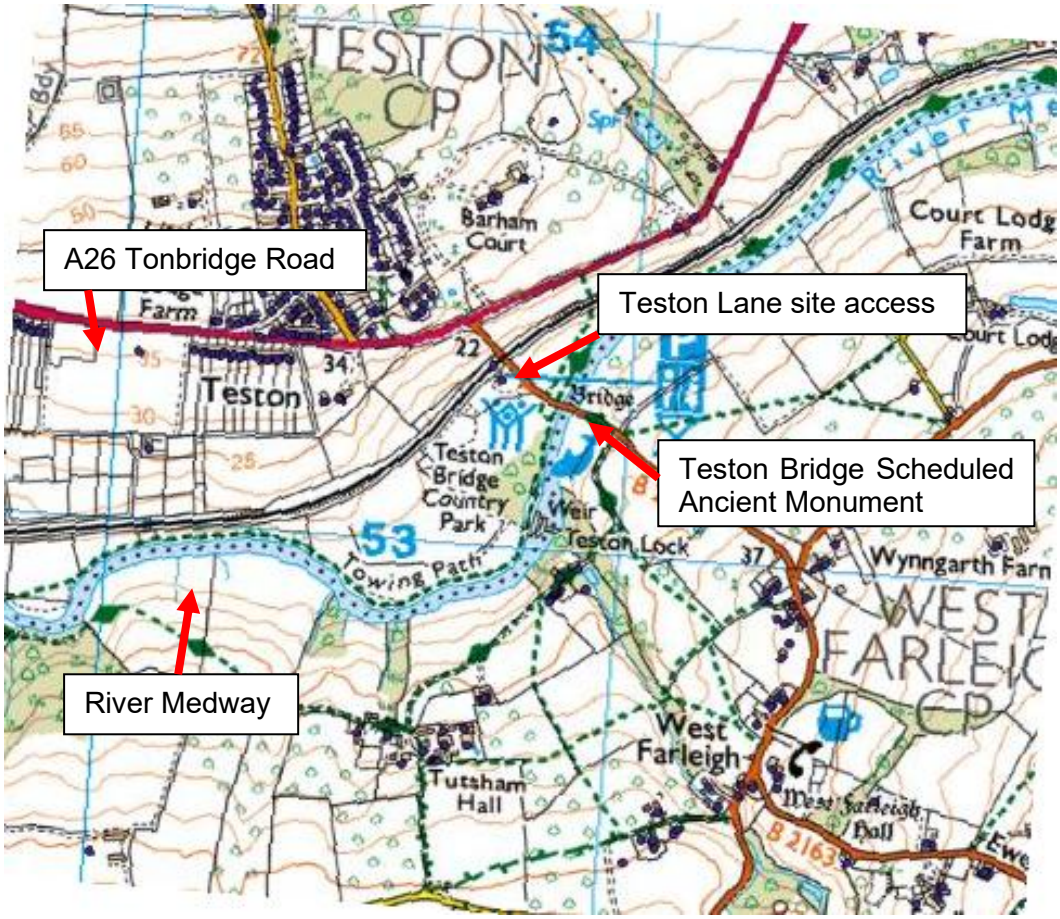
2. Teston Lock sits to the east of the site and the historic Teston Bridge spans the river Medway in the north-east corner which is a Scheduled Ancient Monument and a Grade I Listed Building. The north-west boundary of the site runs adjacent to the railway line.

3. Access is sought from the B2163 (Teston Lane) in the north of the site, leading to an on-site pay and display car-park. An overflow car park is accessed to the west of this car park.

4. The entirety of the site falls within the Medway Valley Landscape of Local Value and is designated as a Local Wildlife Site (MA62), the site is also within Flood Zone 3 (an area with a high probability of flooding. The site falls outside of the urban settlement boundary within the Maidstone Borough Local Plan 2017 and can therefore be considered as being in the countryside.

Retrospective planning permission for engineering works related to the resurfacing of the overflow car park at Teston Bridge Country Park Car Park, Teston Lane, Maidstone, Kent, ME18 5BX - MA/22/503881 (KCC/MA/0141/2022)

General Location Plan



Recent Planning History

5. The country park was previously an area used for grazing livestock. It opened to the public in 1978 however two of the meadows continue to be grazed as part of the site management. Planning history since then includes a planning permission for a mobile catering unit to be sited between 0900 and 1800 hours (MA/09/594).

6. There have also been two retrospective applications made to Maidstone Borough Council by the operator of the car park ticketing system; MA/18/500774 for the Erection of a 4 metre high column with Automatic Number Plate Recognition (ANPR) Camera and MA/18/500775/ADV for an Advertisement Consent for 10 Non Illuminated Pole mounted signs directing users of the Country Park to pay and display for parking.

Background

7. As well as the main car park which is accessed directly from Teston Lane, the Country Park benefits from the use of an overflow carpark. This car park is accessed through the main car park and comprised grass and made ground. It was considered by the Country Park Team that the overflow car park required resurfacing to improve its usability during periods of wet weather. Those works took place in June 2020, and are the subject of this application as planning permission was not sought at the time. The Country Park Team incorrectly considered that the works would benefit from permitted development rights and that a planning application was not required.

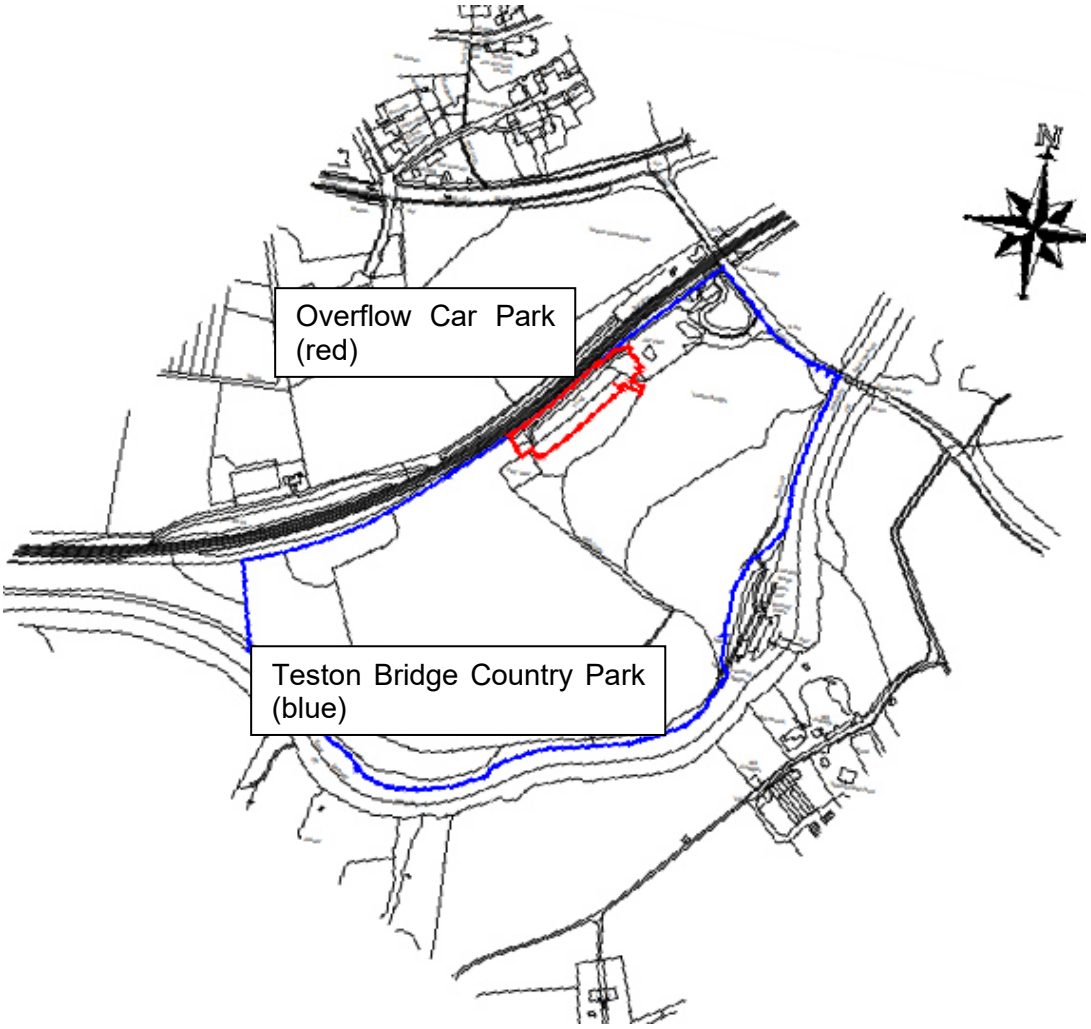
8. Other works which took place in conjunction to the resurfacing included the installation of diamond knee rail fence at the entrance to the overflow car park, a post and rail fence along the northern boundary of the site and the installation of double wooden gate with associated stainless steel hinges and latches. These works were carried out under the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015.

Proposal

9. This application seeks retrospective planning permission for the resurfacing of the overflow car park, with a site area totalling 3916 metres squared. The resurfacing has been carried out with the use of 150mm Ministry of Transport (MOT) type road surfacing compound with a 50mm wearing course of granite/limestone type dusting. The works have also included the installation of wooden bollards, sleepers along the northern edge of the car park and reflectors on the sleepers to demarcate parking spaces. The capacity of the car park is now 140 spaces. No trees were removed to enable the works.

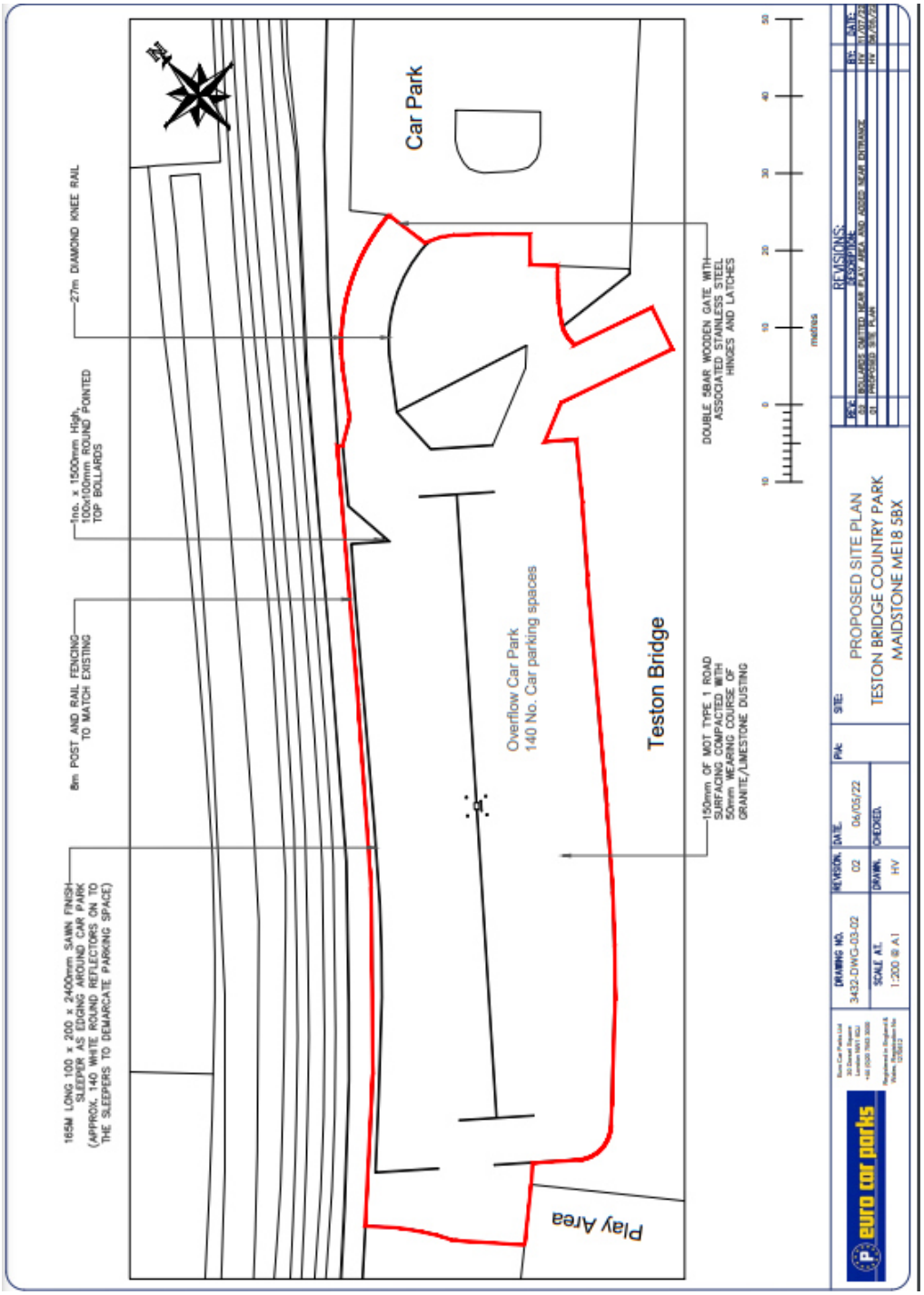
Retrospective planning permission for engineering works related to the resurfacing of the overflow car park at Teston Bridge Country Park Car Park, Teston Lane, Maidstone, Kent, ME18 5BX - MA/22/503881 (KCC/MA/0141/2022)

Site Location Plan



Retrospective planning permission for engineering works related to the resurfacing of the overflow car park at Teston Bridge Country Park Car Park, Teston Lane, Maidstone, Kent, ME18 5BX - MA/22/503881 (KCC/MA/0141/2022)

Site Layout


Car Park
Overflow Car Park
140 No. Car parking spaces
Teston Bridge
Play Area
27m DIAMOND KNEE RAIL
1no. x 1500mm High, 100x100mm ROUND POINTED TOP BOLLARDS
8m POST AND RAIL FENCING TO MATCH EXISTING
165M LONG 100 x 200 x 2400mm SAWN FINISH SLEEPER AS EDGING AROUND CAR PARK (APPROX. 140 WHITE ROUND REFLECTORS ON TO THE SLEEPERS TO DEMARCATE PARKING SPACE)
DOUBLE 5BAR WOODEN GATE WITH ASSOCIATED STAINLESS STEEL HINGES AND LATCHES
150mm OF MOT TYPE 1 ROAD SURFACING COMPACTED WITH 50mm WEARING COURSE OF GRANITE/LIMESTONE DUSTING
metres
REVISIONS:
PROPOSED SITE PLAN
TESTON BRIDGE COUNTRY PARK
MAIDSTONE ME18 5BX
euro car parks
DRAWING NO. 3432-DWG-03-02
SCALE AT. 1:200 @ A1
REVISION. 02
DRAWN. HV
DATE. 04/05/22
CHECKED.

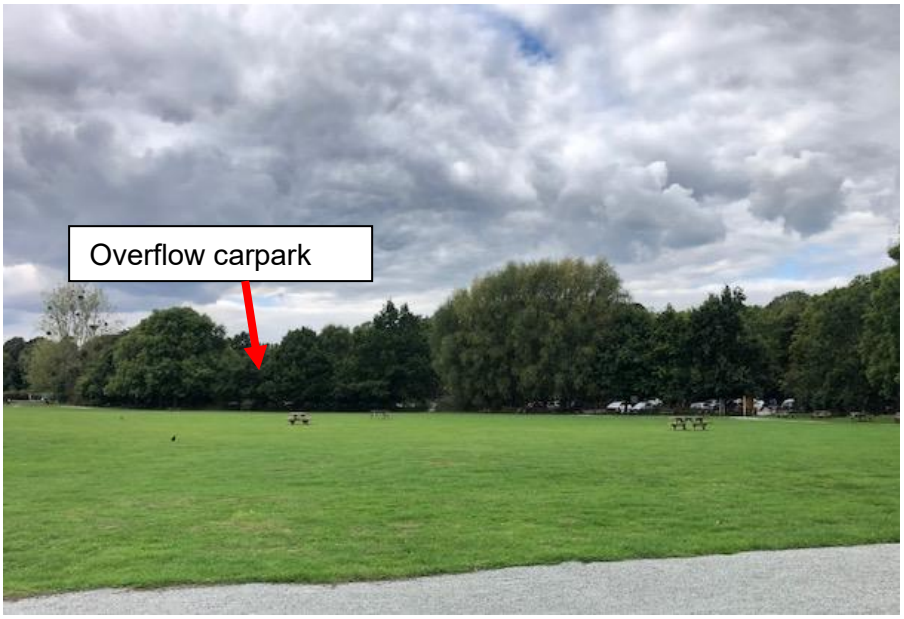
Retrospective planning permission for engineering works related to the resurfacing of the overflow car park at Teston Bridge Country Park Car Park, Teston Lane, Maidstone, Kent, ME18 5BX - MA/22/503881 (KCC/MA/0141/2022)

Teston Bridge overflow car park prior to resurfacing

Teston Bridge overflow car park following resurfacing

Retrospective planning permission for engineering works related to the resurfacing of the overflow car park at Teston Bridge Country Park Car Park, Teston Lane, Maidstone, Kent, ME18 5BX - MA/22/503881 (KCC/MA/0141/2022)

View of the overflow car park from Bridge Meadow



View of the overflow car park from Teston Bridge

Planning Policy

10. The most relevant Government Guidance and Development Plan Policies in respect of this application are summarised below:

(i) **The National Planning Policy Framework (NPPF)** July 2021 and **The National Planning Policy Guidance** (March 2014), sets out the Government's planning policy guidance for England, at the heart of which is a presumption in favour of sustainable development. The guidance is a material consideration for the determination of planning applications but does not change the statutory status of the development plan which remains the starting point for decision making. However, the weight given to development plan policies will depend on their consistency with the NPPF (the closer the policies in the development plan to policies in the NPPF, the greater weight that they may be given).

There is an expectation within the NPPF that planning decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take into account the local circumstances, to reflect the character, needs and opportunities of each area. Furthermore, Local Planning Authorities should approach decision on proposed development in a positive and creative way and look for solutions rather than problems. Decision makers at every level should seek to approve applications for sustainable development where possible.

In terms of delivering sustainable development in relation to this proposal, the following NPPF guidance and objectives are of particular relevance:

- Providing accessible services and open spaces that reflect current and future needs and support communities health, social and cultural well-being (paragraph 8);
- Achieving healthy, inclusive and safe places which are safe and accessible and encourage active and continual use of public areas and enable and support healthy lifestyles (paragraph 92);
- Provide social, recreational and cultural facilities the community needs (paragraph 93);
- Provide access to a network of high quality open spaces and opportunities for sport and physical activity for the health and well-being of communities (paragraph 98);
- Consideration of whether impacts from the development on the transport network (in terms of capacity and congestion), or on highways safety, can be cost effectively mitigated to an acceptable degree (paragraph 110);
- Achieving the requirement for high quality design, creating places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users (paragraph 130); and
- contributing to and enhancing the natural and local environment by protecting and enhancing sites of biodiversity (paragraph 174); and
- Consideration of the impact of a proposed development on a designated heritage asset, giving great weight to the asset's conservation (paragraph 199).

(ii) **Development Plan Policies**

Maidstone Borough Local Plan (adopted October 2017)

Policy SS1 Maidstone Borough Spatial Strategy – Open spaces, rivers and watercourses and landscapes of local value will be conserved and enhanced.

Policy SP17 The Countryside - Development proposals within landscapes of local value should, through their siting, scale, mass, materials and design, seek to contribute positively to the conservation and enhancement of the protected landscape. Development proposals in the countryside will not be permitted unless they accord with other policies in this plan and they will not result in harm to the character and appearance of the area.

Policy DM1 Principles of Good Design – Proposals would be permitted where they create designs and layouts that are accessible to all, respond positively to, and where possible enhance, the local, natural or historic character of the area, create high quality public realm, provide a high quality design which responds to areas of landscape value, protect and enhance biodiversity features, avoid inappropriate new development within areas at risk from flooding and provide adequate vehicular parking.

Policy DM3 Natural Environment – Proposals should protect positive landscape character and avoid damage to locally designated sites of importance for biodiversity. For locally designated sites (including draft published sites), development likely to have an adverse effect will be permitted only where the damage can be avoided or adequately mitigated or when its need outweighs the biodiversity interest of the site.

Policy DM4 Development affecting designated and non-designated heritage assets- New development affecting a heritage asset must incorporate measures to conserve, and where possible enhance, the significance of the heritage asset and, where appropriate, its setting.

Policy DM30 Design principles in the countryside - Proposals which would create high quality design, satisfy the requirements of other policies in this plan and meet the following criteria will be permitted where the type, siting, materials and design, mass and scale of development and the level of activity would maintain, or where possible, enhance local distinctiveness including landscape features and impacts on the appearance and character of the landscape would be appropriately mitigated.

Maidstone Borough Council Local Plan Review 2021

This is a review of the 2017 Local Plan. It is not yet adopted but was submitted to the Planning Inspector for examination in March 2022. Given the stage of the local plan process, limited weight should be afforded to the emerging policies. The relevant policies are:

Policy LPRSS1 Maidstone Borough Spatial Strategy 2022-2037 - Open spaces, rivers and watercourses and landscapes of local value will be conserved and enhanced.

Policy LPRSP9 Development within the Countryside – Development proposals in the countryside will not be permitted unless they accord with other policies in this plan and they will not result in harm to the rural character and appearance of the area.

Policy LPRSP14(A) Natural Environment - Proposals should protect positive landscape character and avoid damage to locally designated sites of importance for biodiversity. For locally designated sites (including draft published sites), development likely to have an adverse effect will be permitted only where the damage can be avoided or adequately mitigated or when its need outweighs the biodiversity interest of the site.

Policy LPRSP14(B) The Historic Environment - New development affecting a heritage asset must incorporate measures to conserve, and where possible enhance, the significance of the heritage asset and, where appropriate, its setting.

Policy LPRSP15 Principles of Good Design - Proposals would be permitted where they create designs and layouts that are accessible to all, respond positively to, and where possible enhance, the local, natural or historic character of the area, create high quality public realm, provide a high quality design which responds to areas of landscape value, protect and enhance biodiversity features, and provide adequate vehicular parking.

Policy LPRQ&D 4 Design Principles in the Countryside - The type, siting, materials and design, mass and scale of development and the level of activity would maintain, or where possible, enhance local distinctiveness including landscape features.

Consultations

11. **Maidstone Borough Council** raise no objection to the proposals. They consider that whilst the materials used to resurface the works are obtrusive, the proposed works are acceptable in terms of visual amenity and impact upon the Medway Valley Landscape of Local Value due to the accessibility it provides to the Country Park, although some additional screening may usefully be imposed. They state that the works serve a need to ensure sufficient access to the Country Park and the screening afforded from the mature trees on the application site boundary mitigate any visual impact. They would however support the implementation of further screening along the application site boundary.

    Teston Parish Council object to the proposal due to concerns over flood risk, biodiversity, heritage and visual impact. They also do not consider there is an established need for the development and feel it would be more appropriate for Maidstone Borough Council to determine the application. They also raise criticism over the retrospective nature of the planning application.

    Environment Agency raise no objection and provide standard advice on sustainable development, land contamination and controlled waters.

KCC Highways and Transportation raise no objection.

KCC Biodiversity raise no objection and advise that they would have been unlikely to request ecological information to be submitted as part of the application as only short, regularly mown areas of grass have been cleared to facilitate the works. They do however state that they would have recommended the area of vegetation within the middle of the parking area was retained and enhanced to provide habitat to benefit biodiversity and support connectivity throughout the site.

Upper Medway Internal Drainage Board did not submit a response.

KCC Conservation Officer raises no objection, note that there is a WWII pill box to the west of the car park but do not believe this would be impacted.

KCC Sustainable Drainage have no comments to make on the application and consider it to be low flood risk.

Network Rail raise no objection to the proposal.

Historic England state they have no comments to make, they defer to the advice of KCC Conservation officers.

Local Member

12. The local County Member for Maidstone Rural West, Mr Simon Webb, was notified of the application on 8 August 2022. No comments have been received to date.

Publicity

13. The application was publicised by the posting of a 4 site notices throughout the Country Park and at the main vehicular access from the public highway and an advertisement in a local newspaper. The application was also publicised under Article 16 of the Town and Country Planning (Development Management) (Procedures) Order 2015 as being within 10m of railway land.

Representations

14. No representations were received on the application from members of the public.

Discussion

15. In considering this proposal, regard must be had to the Development Plan Policies outlined in paragraph 10 above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Therefore, the proposal needs to be considered in the context of the Development Plan Policies, Government Guidance and other material planning considerations arising from consultation and publicity. In my opinion, the key material planning considerations in this

particular case comprise need for the development, visual impact and impact on the landscape character, flood risk and biodiversity.

16. The planning application has attracted one letter of objection (from Teston Parish Council) and referral to the Planning Applications Committee for determination is therefore necessary. However even if no letters of objection were received, the application would be required to be reported to the Planning Applications Committee as a result of governance requirements arising from the applicant, Kent Country Parks, and the Planning Applications Group both falling within the current management arrangement of the Growth and Communities Division of the Growth, Environment and Transport Directorate. In these circumstances legislation requires that the decision is taken by the Planning Applications Committee even if there were no letters of objection received.

17. The application is retrospective. The applicant was under the impression prior to the works taking place that the development benefited from permitted development rights and that a planning application was not necessary. Once the applicant was aware that planning permission was required, it submitted this application to test the planning merits of the proposal.

Design and justification for the development

18. The overflow car park forms an important function in reducing local traffic congestion and ensuring the country park remains as accessible as possible during busier periods. The resurfacing works have taken place in an area of land that was previously used as a car park so no loss of the main amenities of the park (i.e. the open fields, meadows or walking routes) has occurred, therefore the continuation of this use in this location is considered appropriate. The overflow car park is accessed from the main car park which is a logical arrangement and the material used for resurfacing matches that of the main car park which ensures visual continuity and is appropriate in this location.

19. In resurfacing the car park, no changes are proposed to the access or use of the parking area. There is no objection from the Highways and Transportation authority to the proposal.

20. Where the application site was previously an area of grass and made ground, the planning application introduces hard standing which improves the areas' useability during wet weather. The objection to the application questions the need for the development, stating that the busier periods when the overflow car park would be needed are infrequent and tend to occur when the ground is dry (i.e. the summer months) so the area wouldn't be so unpleasant to park in. Furthermore, they consider that if there was an issue with accessibility, then spaces could have been reserved in the main car park for those who need them.

21. The size of the car park remains the same in terms of surface area however the planning application formalises the creation of 140 car parking spaces. As there were no spaces marked out previously, the car park probably accommodated less than this in practice. Therefore, regardless of the ground conditions during busier periods, the works have promoted greater accessibility to the site. An arrangement whereby spaces could be reserved for those who need them is not considered viable in practice and therefore

the resurfacing works are considered to be a suitable solution for ensuring those who wish to visit the country park by car are able to. Maidstone Borough Council support this point of view where the state that the overflow car park was inaccessible at certain times of the year due to rain and mud. The proposal is considered to be in accordance with Policy DM1 (and emerging policy LPRSP15) of the Maidstone Local Plan which requires developments to safely accommodate the vehicular and pedestrian movement as well as other local planning policy and the NPPF which require open spaces to be accessible.

Landscape and visual impact

22. The development falls within the Medway Valley Landscape of Local Value, characterised by the River Medway crossed by distinctive ragstone bridges and surrounded by steep valley sides. Teston Parish Council consider the development to be at conflict with this designation and state that the materials used for resurfacing are not sympathetic to the wider rural landscape. Whilst Maidstone Borough Council were overall supportive of the scheme due to it improving the accessibility of the site, they concurred with this point somewhat where they state that the materials used are "obtrusive".

23. It is recognised that where an area of open field or grassland is resurfaced with hardstanding there is an impact upon the natural landscape of an area. In this case, greater consideration is given to this point due to the site being subject to a landscape designation and the proximity to the Listed Building and Scheduled Ancient Monument. However, the overflow carpark is heavily screened by a belt of trees and foliage and is situated next to the existing car park which is surfaced with the same material. Therefore, the impact is considered to be minimal when viewed in the wider context of the country park and surrounding area. Photos taken of the overflow car park from further away viewpoints such as the Public Right of Way and Teston Bridge, and even closer within the park itself demonstrate that the car park is heavily screened and does not, in my view, adversely impact the natural landscape setting. It is noted that Maidstone Borough Council agreed with this assertion where they accept that the car park is heavily screened on all boundaries. However, they do suggest that the screening may be enhanced and protected through the addition of planning conditions. Given the screening effect of existing landscaping along the car park boundary it is not considered necessary to require additional planting, but a condition is proposed to ensure that the existing screening is maintained.

24. There was also criticism by the Parish Council that the impact upon the landscape is greater when considered cumulatively with other resurfacing projects which have taken place across the park. This includes a temporary access road used by the Environment Agency for works to Teston Lock, which falls outside of the remit of the County Planning Authority and a number of pathways. The planning status of these paths is currently being considered and if need be planning permission will be sought. However, due to the natural screening afforded to the overflow car park, it is not considered that there is any adverse impact when considered alone or in conjunction with other projects on site. Therefore, I consider that the application does not conflict with the purpose of the landscape designation or local and national planning policy which intends to preserve the natural landscape.

Flood Risk

25. The application site is within Flood Zone 3 which is designated by the Environment agency as an area with a high probability of flooding. Within their objection, Teston Parish Council raise concern over the potential increased risk of flooding due to this development as a result of replacing a grassed area with hard surfacing, stating that the site has been subject flooding events in the past.

26. The application was accompanied by a Flood Risk Assessment which concludes that due to the materials used to resurface the car park, any increased water run off would be negligible and as the application does not introduce any impermeable area it would not result in any increased flood risk within the application site or elsewhere. The Environment Agency were consulted on the application and stated that they raise no objection. KCC Flood Risk Officers were also consulted as the Lead Local Flood Authority who stated they had no comment to make and consider the development to be of low risk in terms of flooding.

27. With this in mind, and due to a permeable material being used for the resurfacing, this application is not considered to represent inappropriate development within an area at risk of flooding which planning policies state should be avoided. Therefore, it is my view that the application should not be refused on flood risk grounds.

Heritage conservation

28. The application site is approximately 180 metres away from Teston Bridge, which is Grade 1 Listed Building and a Scheduled Ancient Monument. The bridge can be considered a focal point of the Country Park and represents the type of ragstone bridge which the landscape of the Medway Valley is noted for. Therefore, careful consideration must be given to ensure that any new development conserves, and where possible enhances, the significance of the heritage asset and, where appropriate, its setting. Heritage concerns were raised by Teston Parish Council over this specific point

29. Historic England were consulted on the planning application and advised that they had no comments to make, deferring the matter to our own conservation advisers. KCC Heritage Conservation were consulted on the application and advised that they raise no objection.

30. The overflow car park area is not highly visible from the bridge itself or in the wider site context. Due to the natural screening afforded to the application site it is not considered to adversely impact the setting of this designation and conserves the significance of the heritage asset. The application is therefore considered acceptable in regard to development plan policy.

Biodiversity

31. The application site is designated as a Local Wildlife Site (MA62). None of the three meadows were impacted by the works and the area existed as a car park prior to the resurfacing taking place. Furthermore, no boundary trees or hedgerows were removed to enable the scheme to go ahead. As such, it is not considered that the application would have an adverse impact on features of ecological importance. KCC Biodiversity Officers concurred with this point of view, stating that they would have been unlikely to require ecological information to be submitted as part of the application as only short and regularly mown areas of grass would have been removed.

32. KCC Biodiversity also state that they may have requested the area to the middle of the car park be retained and enhanced to promote ecological connectivity throughout he site. Whilst it is unfortunate that this cannot now be achieved, it is not considered that there would be any adverse impact on biodiversity such that the application should be refused.

Governance process

33. Within the objection from Teston Parish Council, criticism is made about KCC representing both the applicant and the determining authority suggesting that the application should be determined by Maidstone Borough Council. Whilst this is not a material planning concern, it should be noted that this is not an option available to the applicant under the provisions of the Town and Country Planning General Regulations 1992, which represents the statute that the application is to be determined under. The power to determine planning applications where a local authority requires planning permission for its own development is governed by Regulation 3 of the 1992 Regulations. This legislation is typically used for projects where the County Council intends to carry out development to meet its service requirements i.e. new school development or in this case the Country Park. Where a development falls within the remit of Regulation 3 of the 1992 Regulations, then an application needs to be made to the Council's planning authority and there is no discretion. This is the same planning process that is followed by every local authority wishing to carry out its own development.

34. This is accepted by Maidstone Borough Council who note in their response that Kent County Council is the appropriate determining authority, and that they represent a consultee in this case.

35. Finally, there was criticism over the application being submitted retrospectively. The applicant was under the impression prior to the works taking place that the development benefited from permitted development rights and that a planning application was not necessary. Once the applicant was aware that planning permission was required they submitted this planning application to test the planning merits of the proposal. The matter has been reported to the Regulation Committee and the applicant has been advised they must seek advice from the Planning Applications Group prior to undertaking any future works at the site. In determining the application, it must be considered on its merits in the context of the Development Plan policies and other material considerations regardless of the fact that is has been submitted retrospectively and the development has taken place.

Conclusion

36. The proposal seeks retrospective planning permission for the resurfacing of the overflow car park at Teston Bridge Country Park. The proposal improves the accessibility to the country park by ensuring that the overflow car park can be used to its full capacity all year round. No changes are proposed to the access or the use of the overflow parking area. The proposal is considered acceptable in terms of its siting and design, and is not considered to present any unacceptable adverse impact in terms of landscape, flood risk, biodiversity or heritage conservation.

37. The development is in accordance with the general aims and objectives of the relevant Development Plan Policies and the principles of the National Planning Policy Framework and therefore the recommendation is that planning permission be granted subject to a condition regarding the retention and maintenance of the planting to the car park boundaries to provide adequate screening.

Recommendation

38. I RECOMMEND that PERMISSION BE GRANTED SUBJECT TO the imposition of conditions covering (amongst other matters) the following:

- Retention and maintenance of planting to the boundaries of the overflow car park. Any trees that are diseased or felled shall be replaced within the next planting season with native species to be agreed with the county planning authority.

Case Officer: Mrs Alice Short	Tel. no: 03000 413328

Background Documents: see section heading

E1 COUNTY MATTER APPLICATIONS AND DETAILS PURSUANT PERMITTED/APPROVED/REFUSED UNDER DELEGATED POWERS - MEMBERS' INFORMATION

Since the last meeting of the Committee, the following matters have been determined by me under delegated powers:-

Background Documents - The deposited documents.

MA/22/502575	Section 73 application to vary conditions 2 and 14 of planning permission MA/17/501165 to amend the layout of the non-hazardous waste recovery facility. Cleansing Service Group Ltd, Cobtree House, Forstal Road, Aylesford, ME20 7AG Decision: Permitted
SE/21/947/R	Non-material amendment of planning application SE/21/947 for the proposed relocation of the approved above ground fire (sprinkler) water tank and relocation of the external plant room door. Land at Dunbrik Depot, Main Road, Sundridge, Kent TN14 6EP Decision: Approved
SE/21/947/R15	Details of external lighting pursuant to condition 15 of planning permission SE/21/947. Land at Dunbrik Depot, Main Road, Sundridge, Kent TN14 6EP Decision: Approved
SE/21/1546/R7	Details of a Site Management Plan pursuant to Condition 7 of planning permission SE/21/1546/R7. Court Lodge Farm, Stack Road, Horton Kirby, Dartford, Kent DA4 9DU Decision: Approved
SE/22/2394	Section 73 application for the temporary relaxation of condition 13 of planning permission SE/90/1302 to permit operation of the Waste Transfer Station over the Christmas/New Year Bank Holidays (Tuesday 27 December 2022, Saturday 31 December 2022, Monday 2 January 2023 and Saturday 7 January 2023) to support the local kerbside waste collection service over this period. Dunbrik Waste Transfer Station, Main Road, Sundridge, Sevenoaks, Kent TN14 6EP Decision: Permitted
SW/22/500475	Section 73 application for the variation of conditions contained in consent SW/13/939 to extend the consent life to 31 October 2022 allowing site restoration. Land to the South of the A2 (Hempstead House) and East of Panteny Lane, Bapchild, Sittingbourne, Kent Decision: Permitted

TM/20/1522/R Non-material amendment to planning permission TM/20/1522 - Minor amendment to the wording of condition 2 and condition 5 to ensure consistency throughout the decision notice.
Holborough Quarry, Holborough Road, Snodland, Kent, ME6 5PH
Decision: Approved

E2 COUNTY COUNCIL DEVELOPMENT APPLICATIONS AND DETAILS PURSUANT PERMITTED/APPROVED UNDER DELEGATED POWERS MEMBERS' INFORMATION

Since the last meeting of the Committee, the following matters have been determined by me under delegated powers:-

Background Documents – The deposited documents

CA/21/1093/R9 Details of an updated Travel Plan pursuant to Condition 9 of planning permission CA/21/1093.
Simon Langton Grammar School for Boys, Langton Lane, Nackington, Canterbury, Kent, CT4 7AS
Decision: Approved

CA/21/1429/RVAR Details of the additional cycle parking facilities (Condition 6), details of the proposed external lighting, including hours of use and level of illumination (Condition 10) and details of the proposed green roof planting and site landscape scheme to include details of native species, those suitable for bee pollination and a future maintenance programme (Condition 13) pursuant to planning permission CA/21/1429.
Whitstable and Seasalter Endowed C Of E School, High Street, Whitstable, Kent CT5 1AY
Decision: Approved

CA/22/542 Conversion of an existing redundant swimming pool building to a new classroom block.
Parkside Community Primary School, Tennyson Avenue, Canterbury, Kent, CT1 1EP
Decision: Permitted

CA/22/1412 Installation of a new roof overlay system and replacement of existing lanterns with new roof lights.
Herne C of E (Controlled) Infant School, Palmer Close, Herne, Kent, CT6 7AH
Decision: Permitted

CA/22/01261 Replacement and refurbishment of external windows and doors.
Herne Bay Library, 124 High Street, Herne Bay, Kent CT6 5JY
Decision: Permitted

CA/22/1964 Proposed single storey front extension to improve the main entrance.
Joy Lane Primary School, Joy Lane, Whitstable, Kent CT5 4LT
Decision: Permitted

DO/20/1048/R30	Details of a Public Right of Way Management Scheme pursuant to Condition 30 of planning permission DO/20/1048 (partial discharge of condition only). Dover Fastrack - Land to the north of Dover and to the south of Whitfield, Kent Decision: Approved
DO/20/1048/R30A	Details of a Public Right of Way Management Scheme for ER60 pursuant to Condition 30 of planning permission DO/20/1048 (full discharge of condition). Dover Fastrack - Land to the north of Dover and to the south of Whitfield, Kent Decision: Approved
KCC/DO/0152/2021	Section 73 application to provide for amendments to the slope of the playing field, inclusion of bunds to the east and south of the playing field, additional land filter drains within the sustainable drainage strategy, importation of topsoil and substrate material to finish the surface of the playing field and consequential amendments to details previously approved pursuant to conditions 2, 3, 4, 5, 6 and 7 of DO/17/1057 and as amended by DO/19/1486. Land on the South East side of Archers Court Road, Whitfield, Dover, Kent CT16 3HU Decision: Permitted
FH/19/1446/R13	Details of a Verification Report pursuant to condition 13 of planning permission FH/19/1446. Sellindge Primary School, Main Road, Sellindge, Ashford, Kent TN25 6JY Decision: Approved
FH/21/0320/R3	Proposed change to permitted construction hours to allow works to take place on Saturdays from 1300 to 1630 hours pursuant to Condition 3 of planning permission FH/21/0320. Harcourt Primary School, Biggins Wood Road, Folkestone, Kent CT19 4NE Decision: Approved
FH/22/1428	Section 73 Application to vary Condition 2 of planning permission FH/21/0320 for the removal of five additional trees. Harcourt Primary School, Biggins Wood Road, Folkestone, Kent CT19 4NE Decision: Permitted
GR/21/0823/R	Non-material amendment to planning permission GR/21/0823 to provide a number of changes to the scheme interally and externally. Gravesend Grammar School for Boys, Church Walk, Gravesend, Kent DA12 2PR Decision: Approved

GR/21/0823/R5	Details of any new external lighting and hours of lighting operation, including the lighting to the car park and access areas, and lighting on the teaching and canteen buildings pursuant to Condition 5 of planning permission GR/21/0823. Gravesend Grammar School for Boys, Church Walk, Gravesend, Kent DA12 2PR Decision: Approved
GR/21/1060/R	Non-material amendment to planning permission GR/21/1060 for the omission of roof overhang over double doors on northern elevation; omission of canopy on eastern elevation; proprietary lean-to canopy instead of bespoke; changes to fenestration on eastern elevation; omission of decorative standing seams on roof; omission of fascia and soffits; galvanized external steelwork instead of painted. Gravesend Grammar School for Boys, Church Walk, Gravesend, Kent DA12 2PR Decision: Approved
MA/20/500047/R4	Details of a Construction Environment Management Plan pursuant to Condition 4 of planning permission MA/20/500047. Newnham Court Shopping Village, Bearsted Road, Weavering, Maidstone Kent ME14 5LH Decision: Approved
MA/20/500047/RVRB	Details of a phased programme of archaeological work in accordance with a written specification and timetable (Condition 12) pursuant to planning permission MA/20/500047. Newnham Court Shopping Village, Bearsted Road, Weavering, Maidstone, Kent ME14 5LH Decision: Approved
MA/21/504154/R3	Details of a Construction Environmental Management Plan pursuant to Condition 3 of planning permission MA/21/504154. Newnham Court Shopping Village, Bearsted Road, Weavering, Maidstone Kent ME14 5LH Decision: Approved
MA/22/502861	Proposed footpath widening. Maidstone Grammar School, Barton Road, Maidstone, Kent, ME15 7BT Decision: Permitted
SE/19/3123/R4 (part)	Details of a Written Scheme of Investigation for an Archaeological Evaluation pursuant to Condition 4 of planning permission SE/19/3123 (partial discharge of condition only). Riverhead Infants School, Worships Hill, Riverhead, Sevenoaks, Kent TN13 2AS Decision: Approved

SE/19/3123/RVAR	Details of external materials (Condition 3), details of a Construction Management Plan (Condition 7), and details of how the development will enhance biodiversity, including the enhancement measures referred to in the Preliminary Ecology Appraisal (Condition 16) pursuant to SE/19/3123. Riverhead Infants School, Worships Hill, Riverhead, Sevenoaks, Kent TN13 2AS Decision: Approved
SE/21/891/R15	Details of a Management & Maintenance Scheme for facilities including management responsibilities, a maintenance schedule and a mechanism for review pursuant to Condition 15 of planning permission SE/21/891. Sevenoaks Grammar Annexe/Trinity School site, Seal Hollow Road, Sevenoaks, Kent TN13 3SN Decision: Approved
SE/21/891/R23	Details of the location and specification of the Cricket Nets pursuant to Condition 23 of planning permission SE/21/891. Sevenoaks Grammar Annexe/Trinity School site, Seal Hollow Road, Sevenoaks, Kent TN13 3SN Decision: Approved
SE/21/891/R24	Details of a Verification Report pertaining to the surface water drainage system pursuant to Condition 24 of SE/21/891. Sevenoaks Grammar Annexe/Trinity School site, Seal Hollow Road, Sevenoaks, Kent TN13 3SN Decision: Approved
SW/21/504168/R4	Details of Remembrance Imagery pursuant to condition 4 of planning permission SW/21/504168. Borden Grammar School, Avenue of Remembrance, Sittingbourne, Kent, ME10 4DB Decision: Approved
SW/21/504168/ RVAR	Details of External Materials (Condition 3), details of the implementation of a Programme of Archaeological Work (Condition 7 in part), details of a Sustainable Surface Water Drainage Scheme (Condition 13), details of a Construction Environmental Management Plan (Condition 18), details of an Ecological Enhancement Plan (Condition 19) and details of a Habitat Management Plan (Condition 20) of planning permission SW/21/504168. Borden Grammar School, Avenue of Remembrance, Sittingbourne, Kent ME10 4DB Decision: Approved
SW/21/505738/R12	Details of a Water Vole Mitigation Strategy pursuant to Condition 12 of planning permission SW/21/505738. A249 Grovehurst Road Junction, Sittingbourne, Kent ME10 2FF Decision: Approved

SW/21/505738/ RVAR	Details of a Method Statement for the protection of reptiles during site clearance and construction works and details of the suitability of the receptor site pursuant to Conditions (13) & (14) of planning permission SW/21/505738. A249 Grovehurst Road Junction, Sittingbourne, Kent ME10 2FF Decision: Approved
SW/22/503264	Temporary Modular Classroom Block (renewal of previous temporary permission). Borden Grammar School, Avenue of Remembrance, Sittingbourne, Kent, ME10 4DB Decision: Permitted
TH/21/0807/R	Non-material amendment to planning permission TH/21/0807 for high-level windows on south elevations omitted and louvres repositioned to accommodate monodraught system. Louvred panels omitted in classroom windows where not necessary and structural column added outside front entrance. Rainwater pipes repositioned to rear of building. Ursuline College, 225 Canterbury Road, Westgate On Sea, Kent, CT8 8LX Decision: Approved
TM/22/203/RVAR	Details of a sustainable surface water drainage scheme (Condition 4), details of an effective outfall for surface water (Condition 5) and details of a Construction Management Plan (Condition 8) pursuant to planning permission TM/22/203. The Judd School, Brook Street, Tonbridge, Kent TN9 2PN Decision: Approved
TM/22/210/R3	Details of the junction between the flat roof and the existing hipped roofs pursuant to Condition 3 of planning permission TM/22/210. St Peters Church of England Primary School, Mount Pleasant, Aylesford, Kent ME20 7BE Decision: Approved
TM/22/565	The enhancement and improvement of three garden zones with new permeable paving, new pergola, new metal screens, planters, a feature spitfire shape seating area with metal water feature and screens and the removal of 3 trees and relocation of one sapling into a planter. The Judd School, Brook Street, Tonbridge, Kent TN9 2PN Decision: Permitted
TM/22/2080	Removal of the existing single glazed timber framed frontage to the library and replacement with aluminium double-glazed frontage incorporating automated double entrance doors. Tonbridge North Library, 5 York Parade, Tonbridge, Kent TN10 3NP Decision: Permitted
TW/22/748/R4	Details of a Construction Management Plan pursuant to condition (4) of planning permission TW/22/748. Broomhill Bank School, Broomhill Road, Royal Tunbridge Wells, Kent, TN3 0TB Decision: Approved

TW/22/1710 Section 73 Application to amend the footprint and design of the proposed building permitted under planning application TW/22/107.
St James's CE Primary School, Sandrock Road, Tunbridge Wells, Kent TN2 3PR
Decision: Permitted

E3 TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 – SCREENING OPINIONS ADOPTED UNDER DELEGATED POWERS

Background Documents –

- *The deposited documents.*
- *Town and Country Planning (Environmental Impact Assessment) Regulations 2017.*
- *The Government's Online Planning Practice Guidance-Environmental Impact Assessment/Screening Schedule 2 Projects*

(a) Since the last meeting of the Committee the following screening opinions have been adopted under delegated powers that the proposed development does not constitute EIA development and the development proposal does not need to be accompanied by an Environmental Statement:-

KCC/CA/0179/2022 - Synthetic turf pitch with perimeter fencing, floodlights, link path and grass bund.
Simon Langton Grammar School for Girls, Old Dover Road, Canterbury, Kent, CT1 3EW

KCC/GR/0140/2022 - Retrospective planning permission for engineering works related to the resurfacing of the overflow car park and internal access road.
Trosley Country Park, Waterlow Road, Vigo, Gravesend, Kent, DA13 0SG

KCC/SCR/SE/0123/2022 - Request for a Screening Opinion as to whether the proposed construction and operation of a hybrid anaerobic digestion facility for the processing of wet and dry waste to produce biogas requires an Environmental Impact Assessment.
Land at Old Tree Yard, Polhill, Sevenoaks, Kent TN14 7AB

KCC/SE/0151/2022 - Section 73 application to vary conditions 3 (to allow an additional 7 months to complete the approved restoration of the landfill (i.e., by 30 April 2023) and 10(h) (to update to the timing of works required by the approved Ecological Mitigation Scheme Prescriptions to reflect the amended operational period) of planning permission SE/19/1754.
Greatness Quarry, Bat and Ball Road, Sevenoaks, Kent TN14 5BP

KCC/SCR/SW/0130/2022 - Screening Request and Request for Approval Under Regulation 77 of the Conservation of Habitats & Species Regulations 2017 for a proposed Cementitious Materials Importation and Storage Facility, making use of an existing warehouse.
Land at Port of Sheerness, Isle of Sheppey, Kent ME12 1RS

Note: In addition to this EIA screening opinion, a Habitats Regulations Assessment Screening Opinion was also issued under Regulation 77 of the Conservation of Habitats & Species Regulations 2017. This concluded that no likely significant effects to a European designated site would occur and that the project could be screened out at Stage 1 of the Habitat Regulations Assessment (HRA) process meaning that appropriate assessment was not required in this instance.

KCC/TM/0195/2022 - Section 73 application to vary condition 2 of planning permission TM/20/2399 to allow sand extraction to continue until 31 March 2024 in the Eastern Extension area.
Borough Green Sand Pit, Maidstone Road, Platt, Sevenoaks, Kent, TN15 8JL

(b) Since the last meeting of the Committee the following screening opinions have been adopted under delegated powers that the proposed development does constitute EIA development and the development proposal does need to be accompanied by an Environmental Statement:-

None

E4 TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 – SCOPING OPINIONS ADOPTED UNDER DELEGATED POWERS

(b) Since the last meeting of the Committee the following scoping opinions have been adopted under delegated powers.

Background Documents -

- *The deposited documents.*
- *Town and Country Planning (Environmental Impact Assessment) Regulations 2017.*
- *The Government's Online Planning Practice Guidance-Environmental Impact Assessment/Preparing an Environmental Statement*

None

F. PLANNING CONSULTATIONS FOR MEMBERS' INFORMATION

The County Council has commented on the following planning matters. A copy of the response is set out in the papers. These planning matters are for the relevant District/Borough or City Council to determine.

F1 Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent TN26 1JR (Application Reference: 22/00571/AS)

County Council's response to Ashford Borough Council on the above

F2 Cradle Bridge Level Crossing Conningbrook Park, Kennington Road, Willesborough (Application Reference: 22/01041/AS)

County Council's response to Ashford Borough Council on the above

F3 Charing Neighbourhood Plan - Regulation 16 Consultation

County Council's response to Ashford Borough Council on the above

F4 Boughton & Dunkirk Neighbourhood Plan – Regulation 16 Consultation

County Council's response to Swale Borough Council on the above

F5 Horsmonden Neighbourhood Plan – Regulation 16 Consultation

County Council's response to Tunbridge Wells Borough Council on the above

F6 EIA Scoping Opinion for a proposed development for land surrounding Ebbsfleet Utd Football Club

County Council's response to Gravesham Borough Council on the above

F7 Supplementary Statement to the additional evidence in the Examination (Stage 1) of the Maidstone Borough Local Plan

County Council's response to Maidstone Borough Council on the above

F8 Folkestone and Hythe CIL Draft Charging Schedule Consultation

County Council's response to Folkestone & Hythe District Council on the above

F9 Tonbridge and Malling Local Plan Regulation 18 Consultation

County Council's response to Tonbridge & Malling Council on the above

F10 Westgate-on-Sea Neighbourhood Plan Regulation 14 Consultation

County Council's response to Westgate-on-Sea Town Council on the above

This page is intentionally left blank

Highways and Transportation
Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD
Tel: 03000 418181
Date: 23 August 2022
Our Ref: MH

Ashford Borough Council
Civic Centre
Tannery Lane
Ashford
Kent
TN23 1PL

Application - 22/00571/AS

Location - Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

Proposal - Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Thank you for the consultation on the Transport Assessment as dated 15th July 2022 on the Ashford Borough Council planning web-site. Unfortunately the scope of the Transport Assessment has not been agreed with Kent County Council Highways and Transportation. A Travel Plan also has still not been submitted to date. I have the following comments on the Transport Assessment:

Local Facilities

The site cannot be considered to be sustainable until Chilmington Green is built out and provides all of the approved facilities such as the District Centre, primary and secondary schools and the various commercial and leisure uses. Until all these facilities are built out travel to key facilities will be outside of the Chilmington Green area and will be by private car due to lack of any formal pedestrian and cycle routes, public transport routes and the excessive distance to Ashford Town Centre. Other nearby villages such as Shadoxhurst and Bethersden do not provide key local facilities and there are no designated footway / cycleways to these villages.

Public Transport

There are currently no bus services serving the Chilmington Green site, and a half-hourly bus service between the site and Ashford Town Centre should have been provided by the developer, Hodson at 100 occupations at Chilmington Green. The existing 2 bus service runs approximately every two hours between Ashford and Tenterden but this is not considered frequent enough to achieve any meaningful modal shift and the existing bus stops are not accessible on foot from the application site as there are no footways along the A28.

Road Safety

Crash data needs to be sourced from KCC's crash data team and not Crashmap as Crashmap is out of date and does not cover the most recent 5 year period.

Development Proposals - Site Access

Stage 1 Road Safety Audits together with Designers Responses have not been undertaken for the proposed access points into the site.

The access point onto Access C Avenue Extension will also require a right hand turn lane as a minimum to prevent right turning traffic backing up to the Access C roundabout.

Vehicle tracking of both access points is required for a 12 metre long bus (not 9.795 metres as currently shown) and a 16.5 metre long articulated vehicle.

The suggested primary road corridor is not compliant with Local Transport Note 1 / 20 in that separated footway / cycleways should be provided adjacent to the primary road.

Trip Generation

The TRICS parameters used to estimate the proposed trip generation from the development are incorrect and should not include the following:
1) Suburban area (this site is not considered to be suburban in location)
2) Population range of between 125,000 and 250,000 within 5 miles (due to the population characteristics of Ashford)

Traffic Impact

No details have been provided as to when the 2022 traffic surveys took place together with the raw data sheets to validate the submitted spreadsheets and junction modelling results.

An assessment year of 2032 is required (year of application plus 10 years) as this is a strategic site with potential traffic impacts on M20 Junction 9. No details of committed developments have been supplied for the 2032 future assessment year and no TEMPRO growth figures have been provided so KCC are unable to confirm the suitableness of the 2032 base traffic figures in the appendices.

Further highway capacity assessments are also required to assess the impact of the development on the local highway network based on the likely traffic flows from the development. This includes the following:
1) A28 Great Chart Bypass / Access A Roundabout
2) A28 Great Chart Bypass / Ashford Road priority junction
3) A28 Great Chart Bypass / Tithe Barn Lane Roundabout
4) A28 corridor between the Matalan and Drovers Roundabout (a VISSIM model will be required to assess the impact of the development on journey times and delay with and without the A28 improvement works as these have not been forthcoming to date by the applicant)
5) The Avenue / Chilmington Green Road crossroads junction
6) A28 Ashford Road / Old Surrender Manor Road priority junction
7) Chilmington Green Road / Tally Ho Road priority junction (this will need to take into account the proposed roundabout junction being promoted by the Court Lodge site)
8) Chilmington Green Road / Ashford Road, Kingsnorth priority junction (this will need to take into account the proposed staggering of the junction being promoted by the Kingsnorth Green site)

I therefore recommend that this application is refused for the following reasons:

1) The proposal, located remote from services, employment opportunities and being unlikely to be well served by public transport, is contrary to the aims of the National Planning Policy

Framework (paragraphs 29 – 41) which seeks to support reductions in green house gas emissions, reduce congestion and minimise journey lengths.

2) The proposed development is likely to generate an increase in pedestrian and cycle traffic on a highway lacking adequate footways and cycleways with consequential additional hazards to all users of the highway.

3) The proposals fails to assess the impact of the development on the local highway network, so it cannot be considered that the development will not result in a severe capacity impact on the local highway network and potential safety implications from increased congestion.

Notes:
No detailed house layout plans have been submitted with this planning application so layout cannot be an approved matter.

Yours Faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.

This page is intentionally left blank

Highways and Transportation
Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD
Tel: 03000 418181
Date: 25 August 2022
Our Ref: MH

Ashford Borough Council
Civic Centre
Tannery Lane
Ashford
Kent
TN23 1PL

Application - 22/01041/AS

Location - Cradle Bridge Level Crossing Conningbrook Park, Kennington Road, Willesborough

Proposal - Full planning application for the construction of a footbridge crossing over the railway line and associated works.

Thank you for the consultation on the above planning application. The proposals have been subject to pre-application discussions with Kent County Council Highways and Transportation to inform the parameters of the footbridge including the proposed width of the footbridge at 2.5 metres in width and approach ramps (to be DDA compliant with a gradient of less than 1 in 20).

There are however a number of finer details that need to be addressed to enable Kent County Council to potentially adopt such a structure. The applicant is also strongly advised to commence an Outline Technical Approval process prior to the granting of any planning permission so all of the asset managers at Kent County Council can comment on the acceptability of the proposals from an adoption point of view with any changes being made to the scheme prior to the granting of any planning permission.

You should also consult my colleagues in the Public Right of Way (PROW) Team here at Kent County Council as the footbridge will involve the closure of the at grade PROW over the railway line and diversion of PROW's AU21 and AU22 and then the diversion or extinguishment of public right of way AU17.

- Kent County Council will not adopt handrail lighting for the bridge as this is not a standard lighting item. This will have to be adopted by the on-site management company at Conningbrook Park or Redrow and confirmation needs to be received from them that they will adopt the lighting.

- A resin bonded surface on the bridge is not acceptable as it is not on our standard palette of materials due to health and safety concerns. A resin bound surface may be acceptable but agreement would need to be reached with the Road and Footway Asset Team at Kent County Council as part of the outline technical approval process.

I look forward to further commenting on the proposals once additional information is submitted to address the above concerns.

Informative: It is important to note that planning permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because planning permission has been granted. For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the public highway. Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have highway rights over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process.

Should the development be approved by the Planning Authority, it is the responsibility of the applicant to ensure, before the development is commenced, that all necessary highway approvals and consents have been obtained and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website: https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181

Yours Faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.

Spatial Planning Team
Ashford Borough Council
Civil Centre
Tannery Lane
Ashford
Kent
TN23 1PL

Growth and Communities

Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Phone: 03000 423203
Ask for: Alessandra Sartori
Email: alessandra.sartori@kent.gov.uk

BY EMAIL ONLY

12 August 2022

Dear Sir/Madam,

Re: Charing Neighbourhood Plan (2011-2030) - Regulation 16 Consultation

Thank you for consulting Kent County Council (KCC) on the Charing Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the Neighbourhood Plan.

Chapter 3 – The Parish

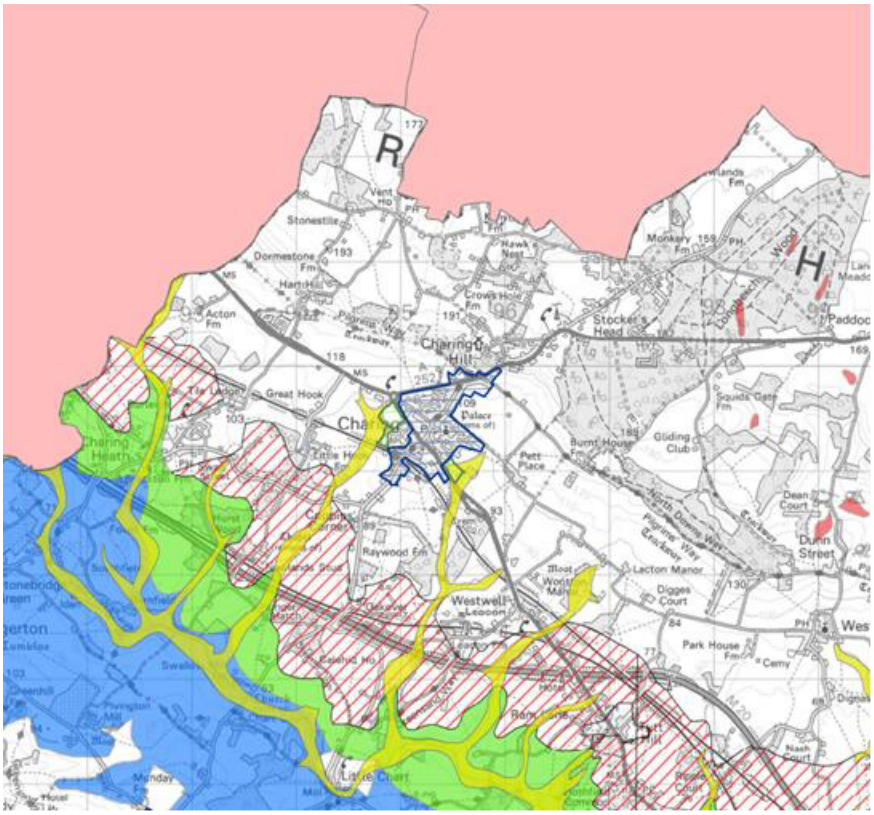
3.8 Quarrying and minerals in Charing

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, acknowledges that KCC's previous response to the Regulation 14 Consultation (Appendix A) mistakenly regards the chalk, which is still being actively extracted in the Neighbourhood Plan area, as a safeguarded mineral. The chalk is an important economic mineral that KCC has to plan for, however, the County Council would clarify that it is not formally safeguarded.

KCC would recommend that the Neighbourhood Plan describes all the safeguarded minerals present in the area, in order to be consistent with the adopted Development Plan, which includes the Kent Minerals and Waste Local Plan (2013-2030) (KMWLP). These are:

- Sub - Alluvial River Terrace Deposits (superficial deposit)
- Sandstone - Sandgate Formation (solid geology)
- Silica Sand / Construction Sand - sandstone: Folkestone Formation (solid geology)

The Neighbourhood Plan could also include an extract from the Ashford Mineral Safeguarding Areas map within the KMWLP, as shown below in an extract of the Charing area. The County Council also recommends that the Neighbourhood Plan corrects references to 'Mineral Safeguarding Zones' – which should instead be referred to as 'Mineral Safeguarding Areas' (MSA).



Solid Geology

Silica Sand/Construction Sand - Sandstone: Folkestone Formation

Sandstone - Sandgate Formation

Superficial Geology

Sub - Alluvial River Terrace Deposits

3.10 Sites of special scientific interest, wildlife sites, & nature reserves

Biodiversity: The County Council welcomes the recognition of the sites of nature conservation, such as the Site of Special Scientific Interest (SSSI) and Local Wildlife Sites, which have been listed. It is also recommended that ancient woodland is included in this list, as this habitat receives targeted protection within the National Planning Policy Framework (NPPF) (2021), and that reference to these sites is made throughout the Neighbourhood Plan.

KCC would also advise that, in accordance with other policy objectives in the Neighbourhood Plan (such as objectives one and two), potential development and other losses of green space are considered in relation to these sites. The County Council would also recommend consideration of a policy within the Neighbourhood Plan which includes appropriate criteria to assess any development proposals within a certain distance of the statutory designated sites and the ancient woodland, which has specific protection under paragraph 180 of the NPPF.

KCC would also note that district and county councils have the authority to lease or purchase land and to designate Statutory Local Nature Reserves under Section 19 of the National Parks and Access to the Countryside Act (1949). The Borough Council is able to delegate its powers for this purpose to the parish council. KCC would draw attention to Local nature reserves: setting up and management for full guidance on this matter.

Chapter 6 – Vision and Objectives

6.1 Plan Objectives

Public Rights of Way (PRoW): The County Council is keen to ensure its interests are represented with respect to its statutory duty to protect and improve the PRoW in the county. KCC is committed to working in partnership with local and neighbouring authorities, councils, and others to achieve the aims contained within the KCC Rights of Way Improvement Plan (ROWIP). The aims include allowing people to enjoy a high quality of life with opportunities for an active and healthy lifestyle, improved environments for people and wildlife, and the availability of sustainable transport choices.

PRoW is the generic term for Public Footpaths, Public Bridleways, Restricted Byways, and Byways Open to All Traffic. The PRoW network provides the means to realise the objectives of this Neighbourhood Plan, including the ability to access and appreciate landscapes for personal health and wellbeing, enhancing community connectivity and cohesion, reducing local traffic congestion for economic benefit and improvement in air quality. KCC recommends that active travel, and PRoW specifically, should therefore be given positive regard within the Neighbourhood Plan and the terms ‘active travel’, ‘green infrastructure’ and ‘ROWIP’ defined accordingly.

KCC recognises that amendments have been made to the Neighbourhood Plan since the Regulation 14 Consultation (Appendix A). The PRoW network contributes to the Neighbourhood Plan's vision for the community and would support the achievement of objectives 2, 7, 8, 12, 13 and 16. Individual PRoW are a material consideration in the determination of any planning application, as stated in paragraph 7.2 of the DEFRA Circular 1/09 and can be a significant factor in determining development proposals. It is therefore recommended that the Neighbourhood Plan acknowledges the value of the PRoW network and how this could be enhanced to deliver the community's vision and key objectives.

With reference to comments made in the previous Regulation 14 consultation (Appendix A), which encourages the improvement of the PRoW network to provide opportunities for sustainable and active travel, KCC would recommend that the Neighbourhood Plan further supports the principles of active travel. The provision of active travel opportunities is an

increasingly significant element of sustainable neighbourhoods, and the Neighbourhood Plan should include specific recognition of PRoW as a valuable component of active travel. The relevant policies within this Neighbourhood Plan should therefore be reviewed and revised in this respect.

KCC would recommend that reference is made to the ROWIP throughout the Neighbourhood Plan, particularly in paragraphs 8.5 and 14.1; policies H1, H6, D1; and section 13. This will enable successful partnership working to continue and deliver improvements to the PRoW network in the parish.

The County Council notes the objective '*Promoting tourism, and, especially, preserving a vibrant High Street'.* Although tourism is an important industry for Kent and the landscape is a key attractor, it - the landscape - is not given significant prominence within the Neighbourhood Plan. Sustainable tourism can be utilised to support rural areas and community services, as well as providing jobs. The PRoW network has a critical role in achieving the County Council's tourism objective within the Framing Kent's Future Strategy (2022-2026) *'Rebrand Kent to attract national and international investment by promoting all that the county has to offer for business, learning, leisure and tourism',* and KCC therefore advises that the Neighbourhood Plan supports improvements to walking and cycling routes.

Heritage Conservation: The County Council is supportive of objective 14 *'to support the full restoration of the Archbishop's Palace'* and objective 15 *'to support all initiatives which preserve heritage in the parish'.* However, the County Council would advise that the restoration and preservation of the heritage will need to be managed more pragmatically than the strongly worded objectives suggest at present.

Chapter 7 - Community Well-Being Policies

PRoW: Improvements to existing access infrastructure and delivery of new infrastructure will be needed to realise the Neighbourhood Plan's vision and objectives, as well as the wider aspirations of the community as develops. The County Council encourages the Neighbourhood Plan to identify a list of access enhancements which the communities would like to see delivered around the parishes; for example, this could include cross-parish links and valued routes into the North Downs. Sharing this list with Ashford Borough Council and the County Council will greatly assist in understanding the needs of the communities and allocating funding if development comes forward.

Heritage Conservation: The County Council notes that there are substantial pressures on the health and social care of Kent's population and the County Council promotes the use of individual and community assets to provide a more person-centric system. As such, heritage can play an important role in the contribution of the arts to person-centred, place-based care through means such as arts-on-prescription activities, cultural venues and community programmes. The historic environment, archaeology and heritage form part of our experience of being human and can provide individual as well as collective opportunities to engage with arts and culture whilst having positive effects on our physical and mental health and wellbeing in the process.

Policy C2: Infrastructure, services, and facilities

PRoW: KCC would advise that this policy is revised to expect development to deliver or provide appropriate contributions for improvements to the PRoW network, to enable safe and attractive walking and cycling connections linking new development to local services, community facilities and existing residents. This will encourage transport away from short private car journeys and therefore helping to reduce local congestion, improve local air quality, and positively influence individuals' personal health.

County Council Community and Infrastructure Services: The County Council would recommend that *'new development must ensure that additional need facilities are in place early during construction'*, is amended to *'new development must ensure that additional need facilities are in place at the appropriate time'.* The County Council supports the timely delivery of infrastructure to ensure that services and facilities are available at the point of need.

Policy C4: Communications infrastructure

County Council Community and Infrastructure Services: To ensure the delivery of this necessary infrastructure, the County Council would advise the inclusion of the following policy requirement:

'Before development commences, details shall be submitted for the installation of fixed telecommunication infrastructure and gigabit-capable (minimal internal speed of 1000mbps) connections to multi-point destinations and all buildings including residential, commercial and community. The infrastructure shall be installed in accordance with the approved details during the construction of the development, capable of connection to commercial broadband providers and maintained in accordance with approved details. It is also recommended that the development complies with any statutory or non-statutory guidance extant at the time a decision on the application for planning permission is made.'

This will support the delivery of future-proofed digital infrastructure in new development as required by paragraph 112 of the NPPF.

Policy C7: Education

County Council Community and Infrastructure Services: KCC supports the requirement of development proposals to provide for necessary education infrastructure and facilities. The County Council is currently seeking contributions, where appropriate, to enable the expansion of Charing Primary School.

Chapter 8 - Traffic and Transport Policies

8.1 Traffic congestion and speed

Highways and Transportation: The County Council, as Local Highway Authority, would advise that 'Kent Highways' is amended to the correct term 'Kent County Council Highways

and Transportation'. Furthermore, KCC notes that Station Road is not a minor unclassified road; it is a C Class classified road and the Neighbourhood Plan should therefore be revised accordingly.

8.3 Residential car parking

Highways and Transportation: The County Council notes that 'Electric Vehicle Parking Standards' are in the emerging Kent Design Guide and require 10% active spaces, the rest passive, for communal car parks. One active charging point for a dwelling with an allocated parking space is also required, therefore, the text should be amended as appropriate.

Policy T5: Rights of way, bridleways, and cycleways

PRoW: KCC would recommend that Policy T5 is amended to reference PRoW and cycleways only, and to protect as well as enhance the PRoW network. PRoW is a generic term including both Public Footpaths and Public Bridleways and the Neighbourhood Plan should therefore be revised throughout to refer to PRoW rather than footpaths or bridleways unless there is specific and particular reason to do so.

Chapter 10 - Countryside and Environment

10.3 Non-listed heritage assets

Heritage Conservation: The County Council is pleased to note the extensive list of non-designated heritage assets, including both archaeological and built assets. All surviving heritage sites have a degree of heritage significance that needs to be identified and considered in advance of any works that could lead to damage. This should be by means of heritage statements, but could also include desk-based assessments and, where appropriate, by archaeological fieldwork.

Policy E1: Historic Environment

Heritage Conservation: KCC welcomes the inclusion of this policy within the Neighbourhood Plan, particularly the recognition that the historic environment can be enhanced as well as conserved.

The historic environment has rightly been identified as crucial to a community's sense of place, as it reminds people how their community came to be and how it took on the shape it has. It can also bring important health and wellbeing benefits. This is particularly important for new developments, whether in the form of new settlements or growth on the urban fringe. If such settlements are to feel part of the continuing story of the parish and form sustainable new communities, then the historic aspects of such places must be recognised and conserved.

The County Council notes the following significant historic environment issues in regard to new developments:

- Design and layout of new developments - New layouts should complement existing historic settlement patterns, should be undertaken sensitively and existing patterns should be retained as much as possible. Developments should respect existing settlement in terms of scale, layout and orientation so that the pre-existing historic settlement is not diminished by the new development.
- Building materials - The County Council would like to see the design of developments complementing any existing local historic character that the area may have. It is also advised that the materials used in the design are appropriate to the existing character, if possible, using locally sourced and traditional materials.
- Protection and conservation of historic remains whether built or buried.
- Incorporation of the historic environment assets into leisure and cultural improvements, particularly relevant for the parish's greenspaces, parks and gardens.
- Working with the historic landscape - new developments may be more successfully integrated with the parish if they work with the existing historic landscape than if they impose an entirely new 'grain'.

Policy E2: The Archbishop's Palace

Heritage Conservation: The County Council is supportive of this policy; however, proposals for restoration need to be sympathetic to the full history of the site and should not artificially restore the site to a particular time or period. KCC would therefore recommend that Historic England is consulted on any proposals at an early stage.

Policy E5: Landscape strategy, and safeguarding and enhancing biodiversity

PRoW: KCC would recommend that Policy E5 is revised with the aim to increase the provision of accessible green spaces and improve opportunities to access this resource. There is a growing body of evidence demonstrating physical exercise in open green space has a positive impact on mental health and wellbeing. Good public transport and active travel links with open spaces should be made available so the public are not dependent on private vehicle use for visiting these sites. It is further recommended that this policy references the ROWIP and the emerging Kent Design Guide, which aids decision-making and promotes good design in PRoW and countryside access management.

Heritage Conservation: The County Council recognises that Charing sits within a landscape that is both historic and vulnerable. To understand and value landscape character fully, it is important to consider its historic aspect. This means the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape and which can shape future growth. The Kent Historic Landscape Characterisation (2001) has identified the broad historic character of the landscape of Kent; however, it is strategic in scope. To be most useful at a local level it needs more detailed refinement as has already taken place in Medway, Tunbridge Wells and other places. KCC would welcome engagement with Charing Parish Council to discuss this community refinement project.

The County Council would also advise that clause c of this policy is modified to '*Proposals should safeguard features of nature conservation and historic interest, and should include measures to retain, conserve, and enhance habitats and networks of ecological interest, including ancient woodland, water features, and ditches, dykes, and hedgerows, as corridors and stepping stones for wildlife'.*

Biodiversity: Whilst the County Council is supportive of this policy in principle, some of the wording is non-committal and non-specific. It is therefore advised that the word 'should' be removed, as proposals will be required to demonstrate there will be no biodiversity loss. This is required within the NPPF and in accordance with the NERC Act (2006) and will be legally required when the Environment Act (2021) is fully implemented. KCC recommends that the policy includes the focus of landscaping towards native species only, as this is the most effective method to ensure maximum biodiversity gains. The County Council would also note that *'…and demonstrate consideration of both near and distant views of the development from key public vantage points where appropriate'* is not related to biodiversity.

It should also be demonstrated that 'wildlife corridors' and 'steppingstones for wildlife' can be safeguarded. This includes their identification within the parish boundary and consideration in regard to future potential development. For example, KCC notes that priority habitats have not been identified, which could act as steppingstones. Moreover, sensitive lighting within developments could be promoted within the Neighbourhood Plan, as this is now considered a primary factor in the decline of invertebrates, which are the faunal basis of our ecosystems.

10.10.1 Mitigation measures taken in this plan

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, is pleased to note that the Neighbourhood Plan sufficiently considers the risk of flooding, particularly the reference to policies ENV6 and ENV9 of the adopted Ashford Borough Council Local Plan, which promote flood risk reduction and appropriate sustainable drainage systems.

Chapter 11 - Housing

Heritage Conservation: The County Council notes that all the proposed development sites within the Neighbourhood Plan have sensitive archaeological issues to address. Recent archaeological investigations close to Arthur Baker fields have revealed an important Roman industrial and cemetery site, including high status burials. Charing was a focus of later Prehistoric and Roman activity; important activity which pre-dates the Medieval Bishops Palace. All the proposed developments will therefore need to consider archaeology carefully, as thorough appropriate assessment prior to application process and detailed mitigation will be required. KCC would also recommend that the archaeological issues of the proposed development sites and required mitigation are included within the Neighbourhood Plan.

Table 10: Summary of site assessment outcomes for approved sites

Heritage Conservation: The County Council has previously commented on the Land Adjacent to Poppyfields development site (Policy S55 in the Ashford Borough Council Local Plan) as part of the Ashford Borough Council site allocations consultation process. The following comments apply to site S55 and all its component areas:

The site contains several recorded metal 'Portable Antiquities Scheme' finds suggesting some level of Roman and later activity. Although the site is south west of the focus of the medieval settlement of Charing, there may be evidence of the use of several ancient trackways converging on Charing. KCC would therefore note that a phased programme of archaeological mitigation will be required. Significant archaeology could be dealt with through suitable conditions on a planning approval.

Policy H1: Land at Parsons Mead

PRoW: The County Council would recommend that this policy is revised to acknowledge the existence of Public Footpath AW349 that passes directly through the site, in addition to referencing the ROWIP. This policy, and each site allocation, should seek to protect and enhance the quality of any PRoW contained within or would be reasonably used for access to other property or local services.

Policy H3: Allocation of land next to Crofters

Highways and Transportation: The County Council notes that the Land next to Crofters site may be able to achieve a suitable access, however, the County Council is concerned with the sustainability of this site. The site is poorly connected to basic services and there is no pedestrian access to the Public House or to bus stops on Church Hill, for which there is only one a day service.

PRoW: KCC is pleased to note that this policy positively recognises Public Footpath AW14, which passes through the site. However, it is recommended that *'preserved'* is replaced with *'protected and enhanced'* given that this footpath could provide important access in future development.

Chapter 12 - Design Policies

12.2 The AECOM heritage and character assessment

Heritage Conservation: The County Council would request that a copy of the 2017 AECOM Heritage and Character Assessment is sent to KCC Heritage Conservation.

Chapter 14 – Other Community Needs

14.1 Cycle and footpath from Charing Heath to Charing

PRoW: KCC notes that the enhancement and enlargement of the PRoW network, as with the road highway network, will involve legal processes and ensuring conformity with appropriate standards. The County Council actively supports communities to deliver their ambitions and recommends that this is recognised within the Neighbourhood Plan. This could be achieved through partnership with the Parish Footpaths Group and KCC's engagement with Charing Parish Council to create a walking and cycling link between Charing and Charing Heath, as promoted in paragraph 14.1.

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,

[redacted]

Stephanie Holt-Castle
Director for Growth and Communities

Enc.
Appendix A: KCC Response Charing NDP 20 February 2020

Parish Clerk c/o
6 Haffenden Meadow
Charing
Kent
TN27 0JR

BY EMAIL ONLY

Environment, Planning and Enforcement

Invicta House
County Hall
MAIDSTONE
Kent ME14 1XX

Phone: 03000 415673
Ask for: Francesca Potter
Email: Francesca.Potter@kent.gov.uk

20 February 2019

Dear Sir/Madam,

Re: Draft Charing Neighbourhood Development Plan, 2011-2030 - Regulation 14 Consultation

Thank you for consulting Kent County Council (KCC) on the Draft Charing Neighbourhood Development Plan (NDP), in accordance with the Neighbourhood Planning (General) Regulations 2012. The County Council has reviewed the NDP and sets out its comments below.

Chapter 5 – Charing, Charing Heath and Westwell Leacon: The Parish

5.2 Connectivity

The County Council welcomes the description of the Public Rights of Way (PRoW) network in Charing and would recommend the text is expanded to include Public Bridleways. The text should also revise the description of the North Downs Way National Trail, the Pilgrims Way and National Cycle Network Route, which are not PRoW at all points. The Parish Council should recognise within the NDP that the KCC PRoW and Access Service has a statutory duty to ensure the network is recorded, protected and maintained in partnership with the Parish Footpaths Group.

5.8.2 Quarrying and Mining Minerals in Charing

The County Council is responsible for both minerals and waste safeguarding in Kent, ensuring that mineral resources are not needlessly sterilised by other forms of development and that the continued lawful operation of permitted waste management capacity of the county is not compromised by new development.

Policy CSM 5 – “Land-won Mineral safeguarding” - within the adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP) sets out Mineral Safeguarding Areas (MSA), where

economically important minerals exist within Kent. The parish incorporates three safeguarded minerals of economic importance, as below. These minerals are coincident with the Ashford Mineral Safeguarding Area (MSA).

- Sub - Alluvial River Terrace Deposits (superficial deposit)
- Sandstone- Sandgate Formation (solid geology)
- Silica Sand/Construction Sand- sandstone: Folkestone Formation (solid geology)

The NDP acknowledges that past mineral operations have extensively occurred within the parish and notes the importance of the area as a supplier of sand from past and present quarrying operations of the Folkestone Formation. The County Council recommends that the NDP also mentions the safeguarded Sub - Alluvial River Terrace Deposits (superficial deposit) and Sandstone - Sandgate Formation (solid geology) which are represented in the parish.

Past and present extraction of chalk is also mentioned within the NDP. Chalk is an important economic mineral that is safeguarded, which should also be recognised within the NDP.

The Parish Council should note that the County Council and the Borough Council agreed, via a Statement of Common Ground[1], that sites in Charing that feature within the Ashford Borough's adopted Local Plan, do not have any significant mineral safeguarding policy concerns.

The parish area has no safeguarded waste management facilities that could potentially have an impact on new development and be required to be considered against the policy provisions of KWMLP Policy DM 8: Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities.

The permitted future quarrying operations in the area are subject to modern restoration planning conditions and are not within 250m of housing allocation sites. Therefore, the safeguarded facilities associated with mineral extraction are not in likely to be compromised by the identified housing growth in Charing.

5.9 Heritage and Character Assessment

The County Council is not aware of the 2017 AECOM Heritage and Character Assessment referred to within the NDP and requests a copy is sent to KCC Heritage Conservation (heritageconservation@kent.gov.uk) .

Chapter 6 Vision and Objectives

The County Council is generally supportive of Objective 14 – *"to support the full restoration of the Archbishop's Palace*" and Objective 15 – "to *support all initiatives which preserve heritage in the parish*". However, it should be noted that both the restoration and

[1] https://consult.kent.gov.uk/file/5472785.

preservation of the heritage will need to be managed more pragmatically than the objectives suggest at present.

The County Council would also like to see reference made to the PRoW network within the five community led themes. This is to reflect the extent to which the PRoW network meets the likely future public need in contributing towards more sustainable development; delivering active travel options and providing opportunities for exercise, leisure and open-air recreation for all community user groups.

Chapter 7 Neighbourhood Plan Policies

Heritage can play an important role in the contribution of the arts to person-centred, place-based health and social care, through means such as arts-on-prescription activities, cultural venues and community programmes. The historic environment provides for positive effects on our physical and mental health and wellbeing in the process. This should be recognised within the NDP.

Policy C2 New Community Centre and Improved Sports Facilities

Specific mention should be given to the improvement and enhancement of the PRoW network to enable safe and attractive walking and cycling connections and links from new developments to community facilities.

Policy C3 Infrastructure and Facilities

The County Council recommends that the Parish Council works with the County Council to ensure people are encouraged to use sustainable means of transport by ensuring local routes and facilities are accessible to the local community.

Policy C8 Education

The County Council, as Education Planning Authority, understands the objective of this policy that includes the statement "*Infrastructure and facilities required to meet the educational needs generated by new development shall be provided as the community is established*". However, in reflection of the role of the Parish and County Council, KCC would recommend the wording is amended to: ***"Contributions to support the development** of infrastructure and facilities to meet the educational needs generated by new development ~~shall be provided as the community is established~~ **should be considered and made available early in the phases of development in order to support** the community as it is established"* **.**

Within the education section, KCC recommends that the NDP also makes reference to early years, secondary schools, and Special Educational Needs (SEN) provision currently located within the parish.

7.2 Traffic and Transport Polices

The County Council, as Local Highway Authority, has a number of concerns regarding the soundness of the transport policies in the NDP, as they are not supported by any supportive evidence and are therefore not developed in accordance with the National Planning Policy Framework (NPPF). The proposed parking policy (Policy T6) is also not in accordance with the recently adopted Ashford Borough Council Local Plan and the Ashford Residential Parking Supplementary Planning Document (SPD). The County Council would strongly recommend that the Parish Council engages with KCC as Local Highway Authority regarding the proposed transport policies moving forward.

7.2.2 Traffic Congestion - Policy T1 – Traffic Congestion

The third point in T1, that states large development should be sited with direct access to the A20, is not supported by evidence to demonstrate that proposals for more than 10 dwellings which are not served from the A20 will lead to unacceptable traffic congestion. KCC, as Local Highway Authority, recommends the following amendment to the wording of the policy: *"Larger developments, in excess of 10 dwellings* ~~should be sited where they have direct access to the A20 to avoid increased traffic congestion on non 'A' category roads~~ ***not served from the A20 will need to demonstrate that their impact is negligible on the highway network or can be mitigated by highway improvement measures".***

The fourth point in Policy T1 recommends developments which create 500 plus vehicle movements a week should have direct access to the A20. This is an arbitrary figure not supported by any evidence. By way of considering the figure - 500 vehicle movements equate to 71 movements a day and based on a typical 5.5 movements per dwelling (based on Trip Rate Information Computer System (TRICS)) this equates to 13 dwellings. This policy should therefore be removed.

The fifth point in T1 proposing to substantially reduce the number of HGVs travelling through Station Road and Pluckley Road, is unlikely to ever be delivered as there are no proposals within the NDP to provide an alternative link south of the A20 that would allow HGVs to avoid Station Road and Pluckley Road.

High quality walking and cycling routes provide opportunities for active travel across the district. The NDP should ensure that development proposals incorporate convenient walking and cycling route, which provide realistic alternatives to short car journeys.

7.2.3 Traffic Management on the A20 - Policy T2 – Traffic Management on the A20

The 500 vehicle movement threshold should be removed from this policy. The proposed wording in the policy is not acceptable to KCC as Local Highway Authority, as the County Council does not take incremental contributions towards highway improvements and would instead expect that such schemes are fully delivered by the developer. KCC, as Local Highway Authority, recommends the following redrafted wording of the policy: "***Proposed significant developments located within the vicinity of the A20 that will increase***

***pedestrian movements across the A20 should deliver pedestrian crossing improvements where possible**."*

Traffic Management Station Road / Pluckley Road – Policy T3 – Traffic Management Station Road / Pluckley Road

This policy contradicts policy T1 and is also not considered to be in accordance with the NPPF as it implies that a proposal for more than six houses off Pluckley Road or Charing Heath Road would be unacceptable. This is not supported by any evidence as to the unsuitability of Pluckley Road or Charing Heath Road.

Policy T5 Pedestrian Footways

Development provides opportunities to create new links and enhance existing routes which would encourage active travel and support a modal shift in travel for short distance journeys. Policy T5 should therefore include a reference to the PRoW network, and its protection and enhancement as a vital component of the transport network, providing valuable opportunities for active travel.

7.2.7 Residential Car Parking Spaces – Policy T6 – Residential Car Parking Space

Visitor parking spaces should be provided at a rate of one space per five dwellings, as set out in the Ashford Residential Parking SPD.

Tandem parking is acceptable with the caveat there should be a 0.5 space per dwelling uplift in visitor parking, as set out in the Ashford Residential Parking SPD.

7.2.8 Charing Village Parking – Policy T7 Charing Village Parking

The County Council does not consider this policy to be acceptable. It is not reasonable to expect development sites within the village of Charing to contribute to a new car park for the village, given that most residents of new development sites are likely to walk to facilities in the village. If future residents are going to use the facilities on the High Street by private car, then they are likely to continue to park on the High Street to the north of the A20 and are extremely unlikely to use the Parsons Mead Car Park.

Chapter 8 Employment Creation and New Business Development

Policy EC1 Locations Allocated for New Business Units (commercial and industrial)

KCC recommends specific mention of the PRoW network within this policy - replacing private vehicle journeys with active travel should be promoted through the NDP.

8.4 New Community Centre with Integrated Business Units

The County Council would like to see specific reference made to improving and enhancing the PRoW network to enable safe and attractive walking and cycling connections and links to new community facilities. Developer contributions could be used to upgrade existing routes or create new path links that address existing network fragmentation issues highlighted by the public.

Chapter 9 Countryside and Environment

9.4 Non-designated assets

The County Council would request that the three milestones in the parish which remain are added to the list of non-designated sites. The milestones are particularly vulnerable to damage and it would be helpful if the Parish Council monitors their condition and informs KCC of any damage. There are also three Second World War crash sites in the parish that are vulnerable to treasure hunters or illegal excavation. Again, it would be helpful if the Parish Council could monitor the sites and inform KCC or the police if any damage occurs.

The list of assets considered 'worthy of conservation' excludes a number of archaeological sites, including sites such as the medieval Eversley manor (Monkary Farm), ridge and furrow near Wickens and a number of Second World War pillboxes. All surviving heritage sites have a degree of heritage significance that needs to be identified and considered in advance of any works which could lead to damage. This should be through the use of Heritage Statements, but could also include desk-based assessments and, where appropriate, archaeological fieldwork.

9.5 Public Green Space

The provision of high quality open green spaces and opportunities for outdoor recreation should be a priority. The NDP should aim to increase the provision of accessible green spaces and improve opportunities to access this resource. There is a growing body of evidence demonstrating that physical exercise in open green space can have a positive impact on mental health and wellbeing. Good public transport and active travel links with open spaces should be made available so that the public are not dependent on private vehicle use for visiting these sites.

Landscape Strategy

Considering the value and importance of the PRoW network, it is requested that this policy text includes reference to the KCC Rights of Way Improvement Plan (ROWIP)[2] and the Kent Design Guide. These documents apply to urban and rural locations and intended to complement and where appropriate, draw together relevant technical and design information, both national and local, that has already been published.

[2] https://www.kent.gov.uk/__data/assets/pdf_file/0005/90491/Rights-of-Way-Improvement-Plan-2018-2028.pdf

Policy E1 Historic Environment

The County Council welcomes the inclusion of this policy within the NDP and the recognition that the historic environment can be enhanced as well as conserved.

The historic environment has rightly been identified as crucial to a community's 'sense of place' as it reminds people how their community came to be and how it took on the shape it has. It can also bring important health and wellbeing benefits. This is particularly important for new developments, whether in the form of new settlements or growth on the urban fringe. If such settlements are to feel part of the continuing story of the parish and form sustainable new communities, then the historic aspects of such places must be recognised and conserved.

The major historic environment issues that need to be taken into consideration include:

- *Design and layout of new developments:* New layouts should complement existing historic settlement patterns, should be undertaken sensitively and existing patterns should be retained as much as possible. Developments should respect existing settlement in terms of scale, layout and orientation so that the pre-existing historic settlement is not diminished by the new development.
- *Building materials:* The County Council would like to see the design of developments complementing any existing local historic character that the area may have. Materials used in the design, where possible, should be appropriate to the existing character, if possible, using locally sourced and traditional materials.
- *Protection and conservation of historic remains:* whether built or buried.
- *Incorporation of the historic environment assets into leisure and cultural improvements*: particularly relevant for the parish's greenspaces, parks and gardens.
- *Working with the historic landscape*: new developments may be more successfully integrated with the parish if they work with the existing historic landscape.

Policy E2 Listed Buildings and non-designated heritage assets

The County Council is supportive of this policy although recommends that the wording is clarified to ensure the objective is clear.

Policy E3 The Archbishop's Palace

The County Council is supportive of this policy although would suggest that proposals for restoration need to be sympathetic to the full history of the site and should not artificially restore the site to a particular time or period. Historic England should be consulted on any proposals at an early stage.

Policy E7 Landscape Strategy

Charing sits within a landscape that is both historic and vulnerable. To understand and value landscape character fully, it is important to consider its historic aspect. This means the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape and which can shape future growth. The Kent Historic Landscape Characterisation (2001) has identified the broad historic character of the landscape of Kent but it is strategic in scope. To be most useful at a local level it needs more detailed refinement as has already taken place in Medway, Tunbridge Wells and other places. This would make an interesting community project and KCC would be happy to discuss such a refinement project with Charing Parish Council.

Policy E8 Ecological Impacts

New buildings, including mobile and park homes, need to adequately address the potential for ecological impacts and provide appropriate mitigation to protect designated species on all sites allocated for development in the parish.

All development will need to adequately address the potential for ecological impacts and provide appropriate mitigation accordingly. KCC therefore recommends that the policy should be encouraging developments to implement the mitigation hierarchy, emphasising that development should be resisted when it cannot demonstrate that there will not be a damaging impact on protected species or habitats.

The County Council also recommends a policy which requires Biodiversity Net Gain. It is likely that Net Gain will be mandated within the Environment Bill and there will be a need for developments to demonstrate that they are meeting at least 10% net gain. This could link into the enhancement improvement of open/green spaces set out in Policy E4 – Designation of Green Spaces in the Parish / E5 – Green Space Development.

Policy E9 Views

In areas where there would be significant effect on PRoW from new development, the network must also be included in the landscape planning of development as a whole. The policy should therefore make reference to PRoW. There should be inclusion of how the Parish Council works in partnership with KCC to record, maintain and develop the network.

Chapter 10 Housing

10.4 Estimated Number of New Houses to be Constructed in the Plan Period

The County Council recommends the NDP should make specific reference to the PRoW network and the opportunities offered to health and wellbeing, tourism, sustainable transport and access to the environment.

10.5 Site Assessments

The County Council recommends that "*Access to services*" also includes the proximity to sustainable, active travel links and connectivity to the PRoW network.

10.5.3 Summary of site assessment outcomes

The County Council has previously provided commentary on the land adjacent to Poppyfields development site as part of the Ashford Borough Council site allocations consultation process. The following comments apply to:

- Land to rear of Northdowns Garage (Policy S28, now part of S55 in the Ashford Local Plan)
- Wheler North land (part of Policy S55 in the Ashford Local Plan)
- Bromley Land west of Wheler North site (part of Policy S55 in the Ashford Local Plan)

The site contains several recorded metal finds, suggesting some level of Roman and later activity. Although the site is south west of the focus of the medieval settlement of Charing, there may be evidence of the use of several ancient trackways converging on Charing. A phased programme of archaeological mitigation will be required. Significant archaeology could be dealt with through suitable conditions on a planning approval.

Allocations in Charing Village Policy H1 – Allocation of housing sites in Charing Village

The County Council recommends that the description and policy should acknowledge the existence of recorded Public Footpath AW349 that passes directly through the site. It is requested that existing PRoW and promoted routes which pass directly through a site or surround a site boundary, are referred to in the description and policy for each site.

Guidance notes for these site allocations should include the following:

1. ***Sites should protect or enhance the quality of any PRoW contained within, or linking to, the site, to ensure recreational opportunities and access to the wider countryside are provided for. This includes access for walking, cycling, horse riding and the availability of open space.***
2. ***The character and value of quiet lanes connected to the site should be considered and protected where possible.***
3. ***The sites should positively add sustainable transport choices. Consideration should be given to the creation of new paths and upgrading of existing routes, to cater for pedestrians, cyclists and equestrians, especially where there are opportunities to connect with the surrounding PRoW network or address safety concerns. It is therefore requested that the KCC PRoW and Access Service is directly involved in future discussions regarding projects that will affect the PRoW network both directly and with a wider countryside impact.***

Allocations in Charing Heath - Policy H2 – Allocation of Housing Sites in Charing Heath

It has not been demonstrated that the land north-west of Swan Street site can provide suitable and safe access, as the red line boundary does not extend right up to the public highway. This site is not sustainable as it is poorly related to basic services and there is no safe pedestrian access to either the Public House or the bus stops on Charing Heath Road (for which there is only one a day service). The allocation of this site would therefore not accord with the National Planning Policy Framework in terms of sustainable development.

The land next to the Crofters site may be able to achieve a suitable access, but the County Council is concerned with the sustainability of this site, as it is poorly related to basic services and again, there is no pedestrian access to the Public House or to bus stops on Church Hill (for which there is only one a day service).

For the Land at Church Hill, KCC recognises that this site can achieve suitable visibility splays. KCC is, however, concerned with the sustainability of this site, as it is poorly related to basic services and again, there is no pedestrian access to the Public House or to bus stops on Church Hill (for which there is only one a day service).

At the Land next to Crofters, Public Footpath AW14 crosses the site and Public Footpath AW323 crosses the Land at Church Hill. It is therefore imperative, that the comments made for Policy H1 - Allocation of housing sites in Charing Village – are applied to other sites proposed allocations.

Policy H11 Infill Development in Charing Village / Policy H12 New Development, including Extensions, Outside Village Confines

KCC requests that the PRoW network is referenced to ensure that the network is considered at an early stage of the design process and successfully incorporated into future developments.

Chapter 11 Design Policies

The County Council recommends that reference is made to the Kent Design Guide, which is due to be refreshed in 2020.

Chapter 12: Creating Strong, Vibrant and Healthy Sustainable Parish

An increased population will undoubtedly add to the pressure and importance of the surrounding PRoW network. Therefore, the NDP should include a package of measures to improve the PRoW Network across Charing to encourage active travel and provide opportunities for outdoor recreation, which in turn help address issues associate with air quality, health and wellbeing.

12.1 Tourism

Tourism is an important industry for Kent and the landscape is a key attractor; sustainable tourism is a way of supporting rural areas, providing jobs and supporting community services. The PRoW network has a critical role in this and therefore, the NDP should support improvements to walking and cycling routes to achieve the County Council's tourism objectives.

12.2.3 Flagship Programme Components

Reference should be made to Public Footpath AW349 in the Flagship Programme. The route of the path should feature in Figure 16 and within the site description text. The opportunity to connect the new facility and the wide range of user groups proposed should be encouraged.

It is requested that the KCC PRoW and Access Service is directly involved in future discussions regarding this project, to advise on the design and delivery and to ensure that any new routes successfully integrate with the existing PRoW network. The County Council would like to engage further with the Parish Council to consider local aspirations for access improvements at this site and potential funding sources for the delivery of these schemes.

The PRoW network is a vital component of the parish assets, providing significant opportunities for active travel and should therefore be specifically referenced to enable the delivery of network improvements across the parish which can provide sustainable transport choices and support growth in the region.

Appendix A Abbreviations

The County Council recommends the following is added as an abbreviation:

PRoW: A way over which the public have a right to pass and repass, including Public Footpaths, Pubic Bridleways, Restricted Byways and Byways Open to all Traffic.

Appendix E Recommendations

The County Council advises that the recommendations within Appendix E that relate to traffic and transport should be included within the Parish Highways Infrastructure Plan for consideration by the Schemes, Planning and Delivery Team at the County Council as Local Highway Authority.

Additional Comments

Waste Management

The County Council, as Waste Disposal Authority, is pleased to see mention of waste policy and the promotion of sustainable waste management solutions within the Strategic Environmental Assessment Scoping Report and Strategic Environmental Assessment.

The County Council would welcome recognition within the NDP of the need for development contributions towards new waste infrastructure in the wider area from new developments within Charing. KCC acknowledges that there are currently no waste management facilities within Charing. This type of facility is strategic in nature, serving a wide area, typically at district level. The combined Ashford Waste Transfer Station and Household Waste Recycling Centre serving the residents of Charing, is at operational capacity and hence any increase in waste tonnages as a result of future development would require mitigation.

Air Quality

The County Council recognises that the Parish Council has raised air pollution as a concern within the NDP. The County Council recommends that further detail is provided in respect of this issue within the NDP and recommends engagement between the Parish Council and KCC on this matter.

Broadband Connectivity

KCC welcomes the NPD inclusion of the promotion of full fibre (fibre-to-the-premise) connections, in both new and existing development, in line with current Government policy. It is recommended that full fibre connections are also delivered within town and village centres. Ashford Borough Council has developed a full fibre policy, (EMP6) which is widely promoted nationally as best practice, whilst being in line with the current National Planning Policy Framework and the Parish Council is recommended to have consideration of this policy.

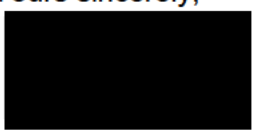
Natural Capital

The provision of a good, connected network of green infrastructure can provide multiple benefits for health and wellbeing, climate change mitigation and adaptation, air quality and biodiversity, as well as supporting walking and cycling between community facilities. The NDP Plan presents an opportunity to connect to and expand existing wildlife corridors through tree and hedgerow establishment, expansion on roadside nature reserves or through the creation of new habitat areas such as community woodland.

The County Council will continue to work with the Parish Council on the formulation and delivery of the NDP and welcomes further engagement as the Plan progresses.

If you require any further information or clarification on any matter in this letter, please do not hesitate to contact me.

Yours sincerely,



Stephanie Holt-Castle
Interim Director – Environment, Planning and Enforcement

Planning Policy Manager
Swale Borough Council
Swale House
East Street
Sittingbourne
Kent
ME10 3HT

BY EMAIL ONLY

Growth and Communities

Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Phone: 03000 423203
Ask for: Alessandra Sartori
Email: alessandra.sartori@kent.gov.uk

25 July 2022

Dear Sir/Madam,

Re: Boughton and Dunkirk Neighbourhood Plan - Regulation 16 Consultation

Thank you for consulting Kent County Council (KCC) on the Boughton and Dunkirk Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference has provided comments structured under the chapter headings and policies within the Neighbourhood Plan.

Section 1.0 Aim, Vision Statement and Key Objectives

Public Rights of Way (PRoW): The County Council is keen to ensure its interests are represented with respect to its statutory duty to protect and improve the PRoW in the county. KCC is committed to working in partnership with local and neighboring authorities, councils and others to achieve the aims contained within the Rights of Way Improvement Plan (ROWIP). The aims include allowing people to enjoy opportunities for an active and healthy lifestyle, with improved environments for people and wildlife, and the availability of sustainable transport choices.

PRoW is the generic term for Public Footpaths, Public Bridleways, Restricted Byways, and Byways Open to All Traffic. The PRoW network provides the means to realise the objectives of this Neighborhood Plan, including the ability to access and appreciate landscapes for personal health and wellbeing, enhancing community connectivity and cohesion, reducing local traffic congestion and improving air quality. KCC recommends that active travel, and PRoW specifically, should therefore be given positive regard within the Neighbourhood Plan.

KCC recognises that amendments have been made to the Neighbourhood Plan since the Regulation 14 Consultation and welcomes the acknowledgment of the County Council's previous comments in this Neighbourhood Plan (Appendix A). Individual PRoW are a material consideration in the determination of any planning application, as stated in paragraph 7.2 of the DEFRA Circular 1/09, and can be a significant factor in supporting or rejecting development proposals. It is therefore recommended that the Neighbourhood Plan acknowledges the value of the PRoW network and how this could be enhanced to deliver the community's vision and key objectives.

The County Council acknowledges that the Neighbourhood Plan's vision has been revised since the Regulation 14 Consultation version and the reference to the 'benefits of the surrounding countryside' has been removed. KCC would encourage that reference to the provision of access to the countryside is included within the Neighbourhood Plan vision.

Section 3.0 Neighbourhood Plan Development

3.5 National Planning Policy Framework 2021

PRoW: The County Council welcomes the recognition of the three overarching objectives of sustainable development and that these *'are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives'.*

KCC would recommend that the Neighborhood Plan supports the principles of active travel. The provision of active travel opportunities is an increasingly significant element of sustainable neighbourhoods, and the Neighbourhood Plan should include specific recognition of PRoW as a valuable component of active travel. Therefore, Policies H1, T1, T2, T4, T5, T7, T8, BE3, CWB1, CWB3, EP2, E1–E10 and AS1–AS13, as appropriate, should be reviewed and revised in this respect. The County Council would also draw attention to comments made in the previous consultation (Appendix A), to reference the need for sites to promote sustainable and active travel links and connectivity to the PRoW network.

Section 4.0 Planning Policy Context

4.5 Boughton Parish Planning Context

PRoW: The Neighbourhood Plan recognises negative issues arising from traffic use at Brenley Corner, with paragraph 4.5.2 stating that *'severe traffic problems at Brenley Corner ... continue to plague the safety of our community and visitors'*. Within the County Council's previous response, it recommended reference should be made to walkers, cyclists and equestrians when referring to any improvement scheme. It is therefore strongly recommended that the Neighbourhood Plan is revised to include this.

Section 5.0 Housing

5.4 Local Plan Review new development concerns

PRoW: Improvements to existing access infrastructure and delivery of new infrastructure will be needed to realise the Neighbourhood Plan's vision and objectives, as well as the wider aspirations of the communities. KCC encourages the Neighborhood Plan to identify a list of access enhancements which the communities would like to see delivered around the parishes; for example, this could include cross-parish links and valued routes to Blean Woods and Faversham. Sharing this list with Swale Borough Council and the County Council will greatly assist in understanding the needs of the communities and allocating funding if and when development comes forward in the locality.

5.12 Plan Site Selection

PRoW: It is noted that the Neighbourhood Plan proposes a single site for development from its call for sites, being Land at Rear of 89 The Street, amalgamating this with other land at Colonels Lane. The Neighbourhood Plan acknowledges the existing Public Footpath across the land; however, it does not consider its connection to other paths linking to valuable local services. The County Council would therefore encourage the Neighbourhood Plan to reference these connections to secure their availability in the long term.

Highways and Transportation: The County Council, as Local Highway Authority, raises no concern with the proposed allocated site being connected via the adjacent current allocation off Colonels Lane and the associated design code as referenced in paragraph 5.12.2.

Policy H2

County Council Community and Infrastructure Services: In respect of the proposed development of up to twelve homes within Policy H2, the County Council will require financial or other contributions to be secured through a Section 106 agreement for:

- Primary – new build and land contributions towards one of the new primary schools in East Faversham, as outlined in Policy EP1.
- Secondary – new build and land contributions towards the new secondary school in East Faversham, as outlined in Policy EP1.
- Library
- Community learning
- Youth
- Adult Social Services and all applicable homes to be Wheelchair Part M4(2) compliant. KCC welcomes this requirement within Policy H1.
- Waste disposal
- Broadband - to achieve fibre to the premises of 1GB capability ‘gigabit-capable’.

The County Council would welcome further engagement as this development proposal is progressed to ensure the necessary infrastructure is available to support the development.

Policy H5

PRoW: KCC strongly recommends reference to the ROWIP within this policy to enable successful partnership working to continue and deliver improvements to the PRoW network in the parishes.

Policy H9

Highways and Transportation: The County Council notes that Policy H9 requires one parking space per bedroom. This contradicts the objectives to reduce car dependency and traffic through the village and therefore, KCC, as Local Highway Authority, is not supportive of this policy. Swale Borough Council has its own Parking Standards which have been examined and deemed appropriate for the borough and accounts for all locations. The Swale Parking Standards also include measures to accommodate Electric Vehicle charging which are not included in the Neighbourhood Plan. The County Council would therefore recommend that Policy H9 refers to the Swale Parking Standards rather than what is currently included.

Section 6.0 Traffic and Transport

Highways and Transportation: KCC notes that the Background Document BD4 - Traffic and Transport was particularly informative and that school related traffic features as a main contributor. However, the Neighbourhood Plan does not mention any support that could be provided by the parishes towards School Travel Plans or the recent Hiyacar car club scheme set up in Faversham. The County Council would encourage the inclusion of these as a way of facilitating a reduction in car ownership and congestion.

6.2 Brenley Corner Junction

Highways and Transportation: The County Council will continue to engage with National Highways and raise the case for this junction to be improved. KCC is acutely aware of the ramifications of any proposed changes on the local highway network and surrounding villages and these will be a factor in any representation made. In this respect, the County Council is supportive of Policies T1 and T2.

6.4 Congestion and parking

Highways and Transportation: KCC recognises that the issues regarding congestion on The Street are a known historic concern. It is noted that the Boughton and Dunkirk Neighbourhood Plan Parking Questionnaire in 2015 regarded this issue as being of high concern, however, there is currently no identified acceptable solution. The County Council understands that the issue of single working along The Street continues to be a constraint to the acceptable level of traffic flows through the village.

Policy T7

Highways and Transportation: KCC is supportive of this policy, as the promotion of active travel throughout the village is in line with the County Council's Local Transport Plan 4 and Active Travel Strategy.

Section 9.0 Educational Provision

Policy EP1

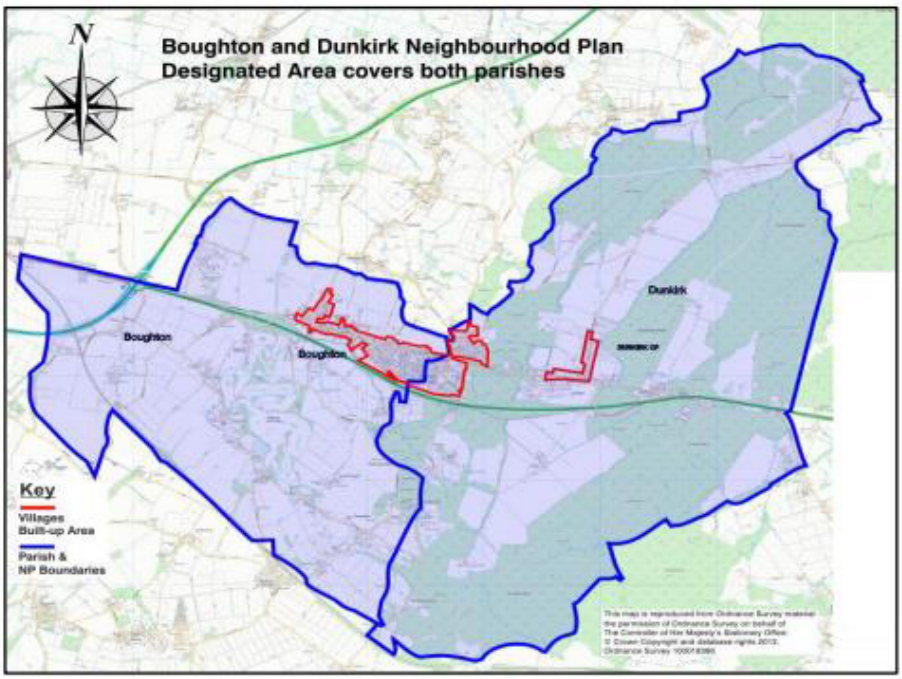
County Council Community and Infrastructure Services: The County Council welcomes the requirement that all new development will be required to make an education contribution via a Section 106 agreement to offset the development's impact on school provision. However, this policy should be extended to cover all the services KCC provides.

Policy EP3

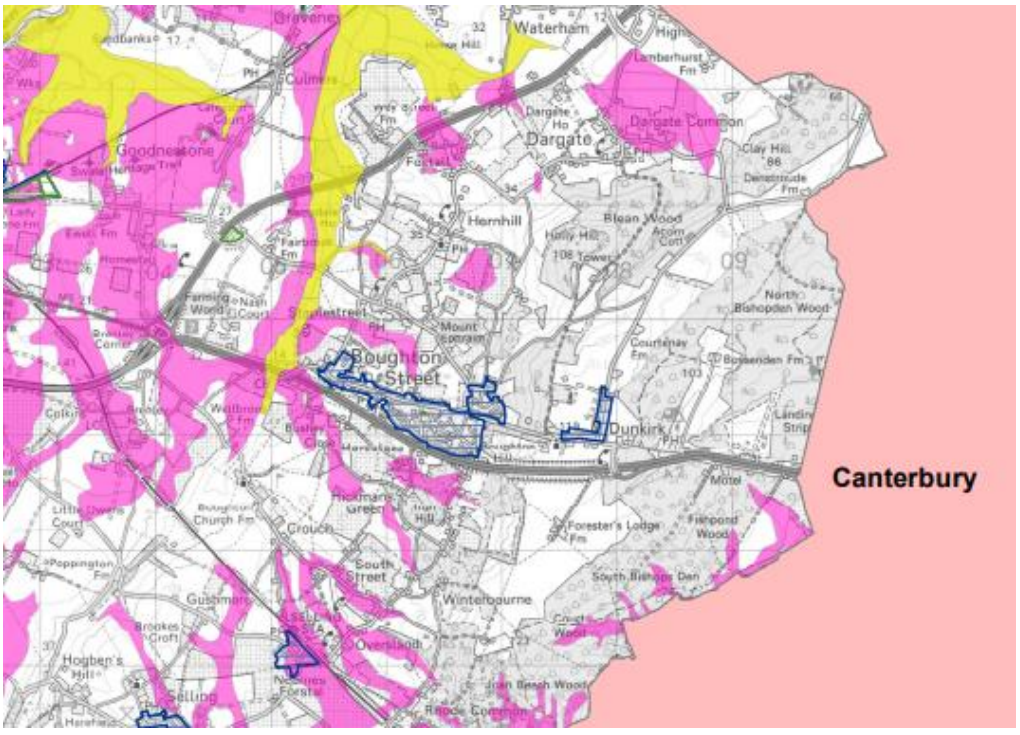
County Council Community and Infrastructure Services: In respect of Policy EP3, KCC would not have access to funding to completely rebuild the Boughton and Dunkirk Primary School, and so land without rebuild funding would be inadequate. If land was adjacent to the school, then there would be a possibility for future expansion. However, KCC is not currently planning any expansion to the school, given the low number of additional houses proposed. There is also a nursery on site and therefore if an alternative site within the village was available at some point in the future to move the nursery, then that would provide some spaces to release more capacity to the school.

Section 10.0 Environment, Landscape Character and Design

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, notes that the Neighbourhood Plan does not include all points made in the KCC response to the Regulation 14 consultation (Appendix A). This includes referencing the safeguarded minerals of Sub-Alluvial River Terrace Sands and Gravel and Brickearth, as well as the Canterbury City Council Mineral Safeguarding Area proposal maps of the Kent Minerals and Waste Local Plan (2013-2030) (KMWLP), as shown below:



Map I. Designated Area for Boughton and Dunkirk Neighbourhood Plan



The County Council, as Minerals and Waste Planning Authority, requests that reference is made to the KMWLP (2013-2030) as future growth in the area may require mineral safeguarding issues to be considered.

Policy E2

Biodiversity: The County Council strongly recommends that Policy E2 references the need to carry out surveys to support the application. Whilst it depends on the site, a Preliminary Ecological Appraisal would initially need to be undertaken to identify if further surveys and mitigation are required. If this is the case, an Ecological Impact Assessment would subsequently need to be submitted.

To ensure that sufficient information is provided to enable consideration to be given to the policy, there will need to be ecological information submitted with the application.

The proposal for 20% biodiversity net gain in the Neighbourhood Plan has been discussed within the Kent Nature Partnership. KCC notes that work is currently underway to assess the viability of 15/20% biodiversity net gain, as there is a need to ensure that it does not materially impact the viability of delivering housing and infrastructure in Kent. There is also a need to ensure that there are opportunities available to enable biodiversity net gain to be undertaken outside of the redline boundary. Therefore, the inclusion of a 20% biodiversity net gain policy is understood, however, there is a need to ensure that any policy proposed is achievable.

Policy E6

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, appreciates that surface water drainage is now referenced within Objective 3 to minimise the environmental impact of development. However, KCC would advise that this is also specifically mentioned within Policy E6. Whilst KCC understands it could be argued that an increase in flood risk from development would *'harm the tranquillity, character or amenity value of the landscape and village environment',* the County Council intended the need for surface water management to be clearly mentioned within the policy. KCC would therefore refer to previous comments provided in the Regulation 14 Consultation (Appendix A), to consider the importance of surface water management in new developments.

It is essential the implications of any new development are considered with regards to the increase of flood risk from all sources and that it is designed appropriately to not increase the risk.

The County Council would therefore advise that additional wording should be included within Policy E6 (or as separate policy) such as "*proposals that seek to discharge surface water from site at a rate greater than existing will not be supported. Surface Water Drainage proposals should seek to maximise the multiple benefits that they can provide and follow the required SuDS hierarchy*".

Glossary

PRoW: The County Council recognises that a glossary is now included, which contains a definition of PRoW. It is recommended that this definition is revised to the following: *'Public access rights over otherwise private land, enabling public users to pass and repass by foot, bicycle, horse, carriage, or motorised vehicle depending on status of the path, being Public Footpath, Public Bridleway, Restricted Byway, or Byway Open to All Traffic.'*

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,

Stephanie Holt-Castle
Director for Growth and Communities

Enc.
Appendix A: KCC response to Boughton and Dunkirk Neighbourhood Plan 13.05.2021

Growth and Communities

Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Phone: 03000 415673
Ask for: Francesca Potter
Email: francesca.potter@kent.gov.uk

Horsmonden NDP
Planning Policy
Planning Services
Tunbridge Wells Borough Council
Town Hall, Civic Way
Royal Tunbridge Wells
Kent TN1 1R

26 August 2022

BY EMAIL ONLY

Dear Sir / Madam,

Re: Horsmonden Neighbourhood Plan - Regulation 16 Consultation

Thank you for consulting Kent County Council (KCC) on the Horsmonden Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the document.

Chapter 1: Overall Strategy

Heritage Conservation: Although the Neighbourhood Plan discusses the rich heritage of the parish, the discussion is currently being presented in a number of different places. The result is that the reader does not get an accurate overall view of the heritage of the parish with some key heritage assets being omitted. KCC recommends that for such a historic area, an introductory section titled 'Landscape History and Heritage' should be included within the Neighbourhood Plan. This could present not only the history of the parish, but also review the range and quality of the surviving heritage assets. This would in turn make it easier to relate this heritage to the themes that are developed later in the Plan. Additional information could be provided on the history of iron-working in Horsmonden, including reference to the site at Horsmonden Furnace, the designed landscapes at Sprivers, Rectory Park and Scotney Castle, the range of agricultural buildings in the parish, the moated sites including the scheduled monument at Share Farm and the historic farmsteads (at least 48).

Objectives

Landscape and Environment

Objective: To retain the distinctive agricultural heritage of the parish, protect views, enhance biodiversity, protect ancient woodland and green spaces and retain dark night skies

Heritage Conservation: The County Council is supportive of this objective but would suggest the term 'agricultural heritage' is amended as there are many aspects of Horsmonden's landscape that are not agricultural in origin. For example, natural woodlands, streams and gills form key elements in the parish's landscape.

Chapter 6: Housing development

Heritage Conservation: Historic England (together with the County Council and the Kent Downs AONB Unit) has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside[1]. This guidance should be referred to within the Neighbourhood Plan.

Chapter 7: Landscape & environment

Introduction

The introductory text provides a reasonable review of the quality of the landscape, however, it should be noted that there is potential for the discovery of archaeological sites of earlier periods than the medieval. Although Horsmonden was unlikely to have been extensively settled in earlier periods, the lack of such sites in the parish may also be as a result of a lack of investigation.

The text rightly identifies the Tunbridge Wells Borough Council Landscape Character Assessment 2017 as a key information resource for consideration of landscape issues. However, it is recommended that the Neighbourhood Plan should also refer to the Historic Landscape characterisation for the Borough[2], and specifically that for Horsmonden. The characterisation is designed to help developers, planners, decision-makers and the public assess the historic importance of Horsmonden's landscape and its component elements.

Policy 7.11 Flooding

The County Council would reiterate commentary raised within its Regulation 14 consultation dated 9 November 2021 (Appendix A) in respect of the direct and indirect impacts that Sustainable Drainage Schemes (SuDS) may have on the historic environment, and the associated guidance on the matter.

[1] http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance
[2] https://tunbridgewells.gov.uk/__data/assets/pdf_file/0008/387665/i-HLC_Horsmonden.pdfs

Additional comments:

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, notes that much of the Plan's area is coincident with the safeguarded Tunbridge Wells Sand Formation (Sandstone) (a landwon mineral). The Neighbourhood Plan should acknowledge the existence of a safeguarded mineral in the area and the safeguarding policy provisions within the Kent Minerals and Waste Local Plan (2013-2030), including the need for Mineral Assessments[3] to be carried out as part of any planning application in the locality.

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,

Stephanie Holt-Castle
Director for Growth and Communities

Enc.

Appendix A: Kent County Council response to Regulation 14 Consultation – 9 November 2021

[3] The Mineral Assessment should assess whether an exemption criterion of Policy DM 7 Land-won Mineral Safeguarding of the Kent Minerals and Waste Local Plan is applicable.

This page is intentionally left blank

Growth and Communities

Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Phone: 03000 415673
Ask for: Francesca Potter
Email: Francesca.Potter@kent.gov.uk

Genna Henry
Planning and Regeneration Services
Gravesham Borough Council
Civic Centre,
Windmill Street,
Gravesend,
Kent DA12 1AU

BY EMAIL ONLY

8 September 2022

Dear Genna,

Re: EIA Scoping Opinion for a proposed development at Land Surrounding Ebbsfleet United Football Club, bounded by Lower Road, Railway Line, Grove Road And The River Thames, Northfleet, Gravesend (Northfleet Harbourside) (Ref: 20220852)

Thank you for consulting Kent County Council (KCC) on the request for a Scoping Opinion for the proposed mixed use development of up to 3,500 residential units, up to 55,000 sq.m (GEA) floorspace of Use Class E, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F) alongside the delivery of circa 3.8 hectares of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road.

The County Council has reviewed the Environmental Impact Assessment (EIA) Scoping Report and sets out its comments below, following the order of the report.

Scoped in Topics: Socio-economic

Education: The County Council, as Education Planning Authority, welcomes the opportunity to have early sight of the proposals for Northfleet Harbourside.

Given the scale of the proposals it is clear that the development will have a significant impact on education provision which will need to be mitigated accordingly.

The Scoping Report acknowledges the subject of school provision by stating:

"There are several primary and secondary schools within the surrounding area. The

closest primary schools are Lawn Community Primary School (approximately 800m southeast) and Manor Community Primary School (approximately 1km southwest). The nearest secondary school is Ebbsfleet Academy (approximately 800m southwest)",

At present, however, a detailed assessment of the availability of school places does not appear to have been undertaken.

The Scoping Report does acknowledge that there is a need to work with the Department for Education and KCC to understand pupil yields and required infrastructure. If new education provision is required, there is no clear indication that this could be accommodated within the development itself.

The current capacity for both primary and secondary provision is at, or near, capacity across much of the Boroughs of Gravesham and Dartford. This is borne out by the latest projections received for primary school provision in both Dartford and Gravesham, and it is clear that a development of this size would result in the need for additional primary school places. The tables below clearly show that the planning areas which would be most heavily impacted by the Harbourside Development are already under pressure in terms of Reception Year and Year 7 places.

Year R Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2021-22 capacity	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2031-32 capacity
Northfleet	140	4	14	5	-2	0	-3	-3	-4	-3	140

Planning Group name	2021-22 capacity	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2031-32 capacity
Swanscombe and Ebbsfleet	330	37	50	45	28	-9	-16	-21	-23	-28	360

Year 7 Surplus/Deficit Capacity if No Further Action is Taken

Planning Group name	2021-22 capacity	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2031-32 capacity
NS - Gravesham and Longfield	1,324	-14	35	-110	-50	-93	-110	-123	-139	-110	1,340
SG - Gravesham and Longfield	420	-28	-5	-61	-35	-54	-57	-61	-67	-59	420

Planning Group name	2021-22 capacity	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)	2028-29 (F)	2029-30 (F)	2031-32 capacity
NS - Dartford and Swanley	1,200	9	41	9	40	-6	-9	-45	-88	-103	1,260
SG - North West Kent	720	-4	-29	-40	-24	-42	-48	-63	-76	-84	720

Without a provisional estimate of what the housing mix will be, KCC cannot provide robust assessments on what the pupil yield may be. The County Council also recommends that there is likely to be need for Special Education Needs provision, youth services, early years (nursery) provision and adult learning. The County Council would therefore welcome engagement from the applicant to ensure that the necessary education infrastructure to support the development and mitigate it's impact is provided.

Sports and Recreation: The County Council would recommend that the applicant ensures opportunities for active travel are integrated into the development to enhance connections between services and communities, and limit car use where possible. The development must also deliver adequate provision for traditional sport as well as informal activity, play and recreation and consider how these spaces are accessed. The County Council would also recommend consideration of Sport England design guidance[1].

The applicant should take note of the Active Lives Survey, which provides continuous measurement of the number of people taking part in sport across the nation and in local

[1] https://www.sportengland.org/facilities-planning/active-design/
https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/
https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/
https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/
https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/facilities-planning-model/
https://www.sportengland.org/facilities-planning/active-design/

communities. The latest figures support the case that inactivity significantly impacts on an individual's physical and mental health, as well as social/community development. Therefore, any development needs to consider this and seek to provide a mix of formal and informal areas/spaces (indoor and out) where people can be active, including walking and cycling routes and open spaces.

Scoped in Topics: Traffic and Transport

Highways and Transportation: The County Council, as Local Highway Authority, has been involved in initial meetings with the applicant's transport consultant to scope the requirements of the Transport Assessment to determine the likely trip generation, distribution and potential mitigation of any impacts in accordance with the National Planning Policy Framework. The development is of sufficient scale and in a location which provides an opportunity to deliver some significant transport infrastructure and service improvements, and the applicant has been encouraged to take advantage of the KCC Kent Transport Modelling Service to facilitate a speedy and thorough assessment.

Scoped in Topics: Archaeology

Heritage Conservation: In respect of heritage conservation matters, the County Council provided a direct response to Gravesham Borough Council in respect of this Scoping Opinion on 24 August 2022 (Appendix A).

Scoped in Topics: Ecology and Biodiversity

Biodiversity: In respect of biodiversity matters, the County Council provided a direct response to Gravesham Borough Council in respect of this Scoping Opinion on 26 August 2022 (Appendix B).

Scoped out Topics: Water Resources and Flood Risk

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, provided a direct response to Gravesham Borough Council in respect of this Scoping Opinion on 25 August 2022 (Appendix C).

Scoped out Topics: Minerals and Waste

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, provided a direct response to Gravesham Borough Council in respect of this Scoping Opinion on 16 August 2022 (Appendix D).

Waste Management: The proposed development includes provision of up to 3,500 residential units within the district of Gravesham. KCC, as Waste Disposal Authority, is required to dispose of kerbside collected waste and also provide a service for householders to dispose of any additional waste brought directly to one of its recycling centres. The Pepperhill Waste Transfer Station (WTS) and Household Waste Recycling Centre (HWRC)

located at Station Road, Southfleet currently serve the whole of the Gravesham District – and are already at capacity.

The Scoping Opinion proposes that 'Waste and Materials' are 'scoped out' of the EIA as they consider that significant effects relating to waste and materials are unlikely. The operational development impact is described in paragraphs 458-463 and appears to conclude that, as the waste arising from the development is only 0.3% of the total waste arising from Kent, that the resultant impact is negligible. Conclusions also appear to have been based upon review of landfill void capacity alone.

The conclusion that landfill is the only final disposal option for waste in Kent is incorrect. KCC disposes of less than 2% of waste to landfill, this is not kerbside collected household waste. All household waste is diverted, either to an energy from waste facility or to multiple recycling facilities, where waste is recovered and treated as a resource for recycling or energy production. The EIA must have consideration of the capacity at these alternative final disposal facilities will need to be made, despite the proposed mitigation stating that sufficient storage and equipment/provisions will be in place to deal with separate waste streams.

Additionally, in order for waste from developments such as that proposed to reach these final disposal facilities, it must first be taken to a Waste Transfer Station for bulking. As stated above, the whole of the Gravesham District is currently served by a single transfer station, which is already at capacity. Provision of an additional 3,500 homes will place an unsustainable burden of demand upon KCC waste disposal services and therefore informed mitigations should be identified within an EIA.

Overall, the EIA must have consideration of waste management and KCC recommends that the matter is addressed within the EIA, alongside the development of a Waste Disposal Strategy. This Strategy should be developed and mitigation agreed through engagement with the Borough and County Council as Waste Collection Authority and Waste Disposal Authority accordingly.

The County Council will continue to work closely with the Borough Council to help to ensure the delivery of new housing and infrastructure in response to local needs. The County Council will welcome further engagement with the Borough Council and the applicant as this planning application progresses.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely,

Stephanie Holt-Castle
Director for Growth and Communities

Enc.

Appendix A: Heritage Conservation response dated 24.08.2022
Appendix B: Biodiversity response dated 26.08.2022
Appendix C: SuDS response dated 25.08.2022
Appendix D: Minerals and Waste response dated 17.08.2022

Genna Henry
Planning & Regeneration Services
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Heritage
GT EPE
Invicta House
County Hall
MAIDSTONE
ME14 1XX

Phone: 03000 413448
Ask for: Casper Johnson
Email: casper.johnson@kent.gov.uk

24 August 2022

Re: 20220852 - Land Surrounding Ebbsfleet United Football Club, Bounded By Lower Road, Railway Line, Grove Road And The River Thames, Northfleet, Gravesend

Request for Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a proposed outline planning application with all matters reserved, except for means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation/remediation works, and the development of up to 3,500 residential units (Use Class C3), up to 55,000 sq.m (GEA) of Use Class E including up to 32,000 sq.m (GEA) floorspace for retail, food, and beverages and up to 18,000 sqm (GEA) office floorspace, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F), delivery of circa 3.8 hectares of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road. Redevelopment of the site will also include some sui generis uses, with hard/soft landscaping, car and cycle parking, highways works, infrastructure provisions with ancillary works.

Thank you for your letter consulting us on the Scoping Opinion request.

The site lies within an area of very high, multi-period, archaeological, geoarchaeological and palaeoenvironmental interest, where the Ebbsfleet valley meets the Thames. This is recognised in the Scoping Report so that cultural heritage and archaeology will be scoped in to the EIA process. The importance of geoarchaeology as well as early and later prehistoric archaeology is recognised in the Scoping Report, but this archaeological and palaeoenvironmental interest and potential could be very complex and include archaeological remains of national or international importance. I recommend that the ES includes a detailed impact assessment based on both desk-based assessment and field evaluation. The archaeological desk-based assessment would include a review of all existing borehole data for the site and the immediate surroundings (within a 500m study area from the redline boundary of the site). The field evaluation would comprise purposive boreholes to

ground truth and develop a deposit model for the site and this geoarchaeological and palaeoenvironmental evaluation would need to be undertaken by specialists approved by the Local Planning Authority.

The Scoping Report recognises the importance of the post-medieval and modern industrial heritage of the site and I recommend that as well as considering Aspdin's kiln under 'Built Environment', it and the cement industry, also need to be considered as 'archaeology'. The industrial archaeology of the site and area will comprise both above and below-ground heritage assets with archaeological interest. The results of recent and ongoing work to the south and east of Grove Road will be important sources of information, some of which may not yet be on the HER but are available through the EDC planning portal.

The ES should include consideration of potential positive benefits of the scheme to learn more about the heritage of the site and the opportunities to promote and communicate this heritage to residents and visitors.

I would be happy to discuss any of the above with the applicant and agree a Written Scheme of Investigation for the field evaluation, as well information about relevant specialists and recent research not yet on the Kent HER.

Yours sincerely.

Casper Johnson
Senior Archaeological Officer
Heritage Conservation

ECOLOGICAL ADVICE SERVICE

TO: ***Genna Henry***

FROM: ***Helen Forster***

DATE: ***26 August 2022***

SUBJECT: ***20220852 Land Surrounding Ebbsfleet United Football Club, Northfleet***

The following is provided by Kent County Council's Ecological Advice Service (EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the County Council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application; and whether sufficient and appropriate ecological information has been provided to assist in its determination.

Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the Planning Officer, who will seek input from the EAS where appropriate and necessary.

We have reviewed the submitted scoping report and we have the following comments:

The submitted information has detailed that a preliminary ecological report has been carried out on site and as a result the following is proposed to be carried out:

- Assessment of impacts the proposal will have on the adjacent Swanscombe Peninsula SSSI
- Assessment of impacts to the LWS adjacent and within 2km of the site
- Assessment of impacts to the SSSI, SPA, Ramsar and NNR within 10km of the site.
- Assessment of impact
- Breeding bird survey
- Wintering bird survey
- Assessment of the quality of the Mud flats.

The submitted information has confirmed that the assessment will assess impacts from construction and operational phase of the proposed development.

We have reviewed the above and advise that we are largely satisfied with the proposal however we highlight that there may be a need for invertebrate surveys following the Mud Flat assessment.

Mitigation/Compensation
We recommend that the proposed development follows the 'mitigation hierarchy' when designing the proposed development. It is described in British Standard BS 42020:2013, and involves the following step-wise process:

- Avoidance – avoiding adverse effects through good design;
- Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
- Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm;
- Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.

The measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development (BS 42020:2013, section 5.5).

We advise that where habitat creation/enhancement is required as mitigation and/or compensation is required to avoid impacts on species, habitats or the designated sites there will be a need for parameter plans to be submitted with the planning application demonstrating that it will and can be implemented within in the proposed development.

It's not sufficient to only have the proposed mitigation and compensation to be demonstrated within indicative landscaping plans as these can be changed with subsequent reserve matter applications (if granted).

Lighting
Artificial lighting can have a negative impact on species (particularly nocturnal species) and therefore there is a need to ensure that consideration is given to minimising light spill from artificial lighting within areas which might be utilised by species. We recommend that with any planning application a dark lighting plan is submitted indicating which areas will receive minimal light spill.

Enhancements
The ecological report submitted with the scoping opinion has made recommendations for enhancements and we recommend that a plan or details are submitted setting out the minimum number of green roofs and enhancement features to be incorporated into the site. We advise that the enhancement features must be incorporated into the buildings and located within the landscaping.

If you have any queries regarding our comments, please do not hesitate to get in touch.

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:
EIA Scoping Opinion Requests; Trium Environmental consulting; July 2022

This page is intentionally left blank

Genna Henry
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Flood and Water Management
Invicta House
Maidstone
Kent
ME14 1XX
Website: www.kent.gov.uk/flooding
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: GBC/2022/091379
Date: 25 August 2022

Application No: 20220852

Location: Land Surrounding Ebbsfleet United Football Club, Bounded By Lower Road, Railway Line, Grove Road And The River Thames, Northfleet, Gravesend,

Proposal: Request for Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a proposed outline planning application with all matters reserved, except for means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation/remediation works, and the development of up to 3,500 residential units (Use Class C3), up to 55,000 sq.m (GEA) of Use Class E including up to 32,000 sq.m (GEA) floorspace for retail, food, and beverages and up to 18,000 sqm (GEA) office floorspace, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F), delivery of circa 3.8 hectares of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road. Redevelopment of the site will also include some sui generis uses, with hard/soft landscaping, car and cycle parking, highways works, infrastructure provisions with ancillary works.

Thank you for your consultation on the above referenced planning application. Kent County Council as Lead Local Flood Authority have reviewed the EIA Scoping Opinion Request report (July 2022) prepared by Trium Environmental Consulting and raise no objections or requirements for surface water drainage at this stage.

The LLFA understand from the Water Resources and Flood Risk Chapter (including surface water drainage) that these considerations are taken out of the EIA Scoping Opinion and will instead be covered in a separate report as part of any future planning submission. We accept this approach and will await for those details to be provided as part of a formal planning application.

The LLFA acknowledge statements 409,424 and 428 in regards to adhering to national and local planning guidance, incorporation of SuDS measures into the development and further consultation with the LLFA will be undertaken to discuss flood risk.

In addition to those policies referenced in statement 409, the LLFA would request the following KCC Policies are considered for designing a future surface water drainage scheme:

- Kent County Council's Drainage and Planning Policy Statement (2019)

- Kent Design Guide Making it Happen- Appendix C2 Drainage Systems

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,

Daniel Hoare
Flood Risk Project Officer
Flood and Water Management

From: Bryan Geake - GT GC
Sent: 16 August 2022 17:09
To: planning.reps@gravesham.gov.uk
Subject: Request for Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 proposed outline planning application Land Surrounding Ebbsfleet United Football Club

Dear Ms Genna Henry

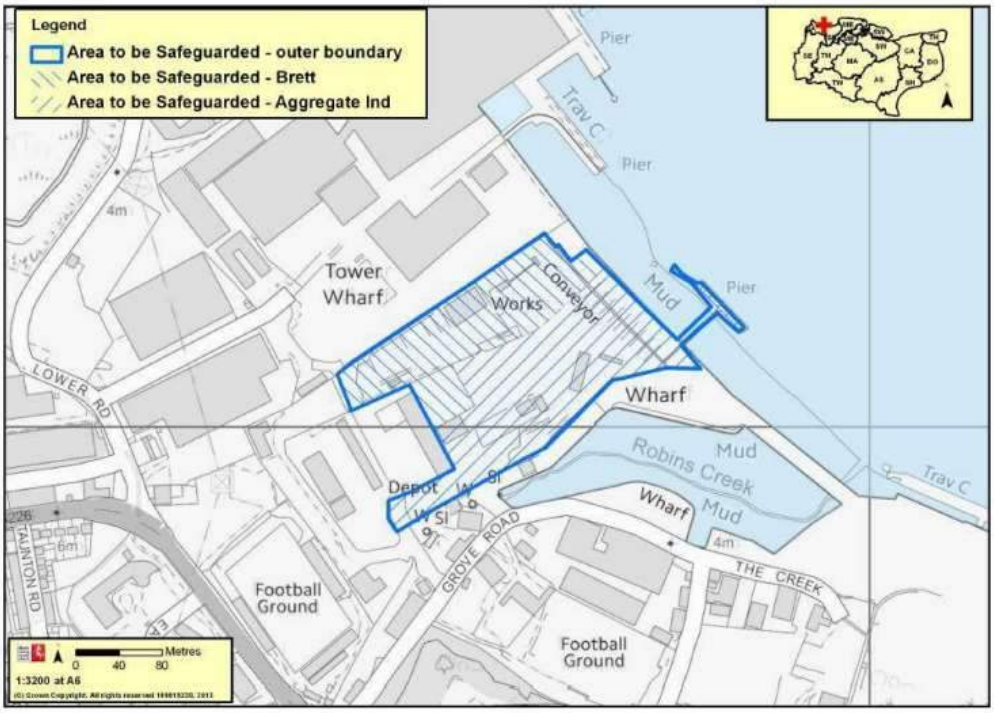
TOWN AND COUNTRY PLANNING ACT 1990 TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2010 REFERENCE NO. 20220852 UPRN 100062311145 PROPOSED DEVELOPMENT Request for Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a proposed outline planning application with all matters reserved, except for means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation/remediation works, and the development of up to 3,500 residential units (Use Class C3), up to 55,000 sq.m (GEA) of Use Class E including up to 32,000 sq.m (GEA) floorspace for retail, food, and beverages and up to 18,000 sqm (GEA) office floorspace, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F), delivery of circa 3.8 hectares of open space and the realignment of the A226 Galley Hill Road / Stonebridge Road. Redevelopment of the site will also include some sui generis uses, with hard/soft landscaping, car and cycle parking, highways works, infrastructure provisions with ancillary works.

LOCATION Land Surrounding Ebbsfleet United Football Club, Bounded By Lower Road, Railway Line, Grove Road And The River Thames, Northfleet, Gravesend,

Thank you for consulting the County Council's Minerals and Waste Planning Policy Team on the above Request for Scoping Opinion.

It can be stated that the potential development referred to as 'Northfleet Harbourside' would directly affect the safeguarded mineral importation facility. The figure below shows the safeguarded area of this facility, Robins Wharf, as identified as Site G in the adopted Kent Minerals and Waste Local Plan 2013-30 Early Partial Review 2020 (the Plan).

Site G: Robins Wharf, Northfleet



The relevant safeguarding policy of the Plan is CSM 6: Safeguarded Wharves and Rail Depots, as reproduced below:

Policy CSM 6

Safeguarded Wharves and Rail Depots

Planning permission will not be granted for non-minerals development that may unacceptably adversely affect the operation of existing, planned or potential sites, such that their capacity or viability for minerals transportation purposes may be compromised.

The following sites, and the allocated sites included in the Minerals Sites Plan, are safeguarded:

1. Allington Rail Sidings
2. Sevington Rail Depot
3. Hothfield Works
4. East Peckham
5. Ridham Dock (both operational sites)
6. Johnson's Wharf, Greenhithe
7. Robins Wharf, Northfleet (both operational sites)
8. Clubbs Marine Terminal, Gravesend
9. East Quay, Whitstable
10. Red Lion Wharf, Gravesend
11. Ramsgate Port
12. Wharf 42, Northfleet (including Northfleet Cement Wharf)
13. Dunkirk Jetty (Dover Western Docks)
14. Sheerness

15. Northfleet Wharf
16. Old Sun Wharf, Gravesend

Their locations are shown in Figure 13: Minerals Key Diagram in Chapter 2 and their site boundaries are shown in Chapter 9: Adopted Policies Maps. The Local Planning Authorities will consult the Minerals Planning Authority and take account of its views before making a planning decision (in terms of both a planning application and an allocation in a local plan) for non-mineral related development (other than that of the type listed in policy DM 8 (clause 1) on all development proposed at, or within 250m of, safeguarded minerals transportation facilities.

Essentially the safeguarded site (a mineral importation wharf) is protected from direct loss, or it being made unviable by allowing incompatible development to occur in its proximity (within 250m is the policy's stipulation) that may cause the continued viable operation of the facility adversely affected. This to include its maintenance of adequate accessibility. If the proposal is indeed to incur the loss of the safeguarded site, then this would have to be successfully argued by invoking an exemption from the presumption to safeguard by meeting the requirements of Policy DM 8: Safeguarding Minerals Management, Transportation Production & Waste Management Facilities. The policy states:

Policy DM 8

Safeguarding Minerals Management, Transportation Production & Waste Management Facilities

Planning permission will only be granted for development that is incompatible with safeguarded minerals management, transportation or waste management facilities, where it is demonstrated that either:

1. it constitutes development of the following nature: advertisement applications; reserved matters applications; minor extensions and changes of use and buildings; minor works; and non-material amendments to current planning permissions; or

2. it constitutes development on the site that has been allocated in the adopted development plan where consideration of the other criteria (1, 3-7) can be demonstrated to have taken place in formulation of the plan and allocation of the site which concluded that the safeguarding of minerals management, transportation, production and waste management facilities has been fully considered and it was concluded that certain types non-mineral and waste development in those locations would be acceptable; or

3. replacement capacity, of the similar type, is available at a suitable alternative site, which is at least equivalent or better than to that offered by the facility that it is replacing; or

4. it is for a temporary period and will not compromise its potential in the future for minerals transportation; or

5. the facility is not viable or capable of being made viable; or

6. material considerations indicate that the need for development overrides the presumption for safeguarding; or

7. It has been demonstrated that the capacity of the facility to be lost is not required.

Replacement capacity must be at least equivalent in terms of tonnage, accessibility, location in relation to the market, suitability, availability of land for processing and stockpiling of waste (and materials/residues resulting from waste management processes) and minerals, and:

- ***in the case of wharves, the size of the berth for dredgers, barges or ships***
- ***in the case of waste facilities, replacement capacity must be at least at an equivalent level of the waste hierarchy and capacity may be less if the development is at a higher level of the hierarchy***

There must also be no existing, planned or proposed developments that could constrain the operation of the replacement site at the required capacity.

Planning applications for development within 250m of safeguarded facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed.

Further guidance on the application of this policy will be included in a Supplementary Planning Document

It is assumed that the Northfleet Harbourside proposals would be directly in conflict with the presumption to safeguard the mineral importation facility. Therefore, any planning application would have to include an Infrastructure Assessment (IA) to argue, evidentially, why an exemption criterion, (1. to 7 as shown above) can be invoked.

If you would wish to discuss any of the above in greater detail, please do not hesitate in contacting me on the above email.

Yours sincerely

Bryan Geake ***BSc Hons (Geol), MSc, MRTPI***

Bryan Geake| Principal Planning Officer | Environment, Planning and Enforcement |Growth & Communities | Kent County Council First Floor, Invicta House, County Hall, Maidstone, Kent ME14 1XX |Telephone: 03000 413376 | www.kent.gov.uk/planning

Growth, Environment & Transport

Sessions House
County Hall
MAIDSTONE
Kent ME14 1XQ

Phone: 03000 411683
Ask for: Simon Jones
Email: Simon.Jones@kent.gov.uk

Louise St John Howe
Programme Officer [Maidstone Borough Council Local Plan Review]
PO Services
PO Box 10965,
Sudbury, Suffolk CO10 3BF

BY EMAIL ONLY

20 October 2022

Dear Louise,

Re: Supplementary Statement to the additional evidence submitted in the Examination (Stage 1) of the Maidstone Borough Council Local Plan Review

Thank you for inviting Kent County Council (KCC) to submit a Supplementary Statement to the Examination of the Maidstone Borough Council (MBC) Local Plan Review.

The County Council is concerned with the amount of additional information that has been submitted at this late stage of the Local Plan process. The County Council does not consider that there is adequate time to assess all of the information sufficiently before the next set of hearings currently scheduled in November.

In particular, a significant amount of additional information relating to the proposed allocation of Heathlands Garden Settlement (Policy LPRSP4(A)) - not submitted as part of the evidence base supporting the Local Plan Review Regulation 19 Draft for Submission document - has been received over the last few weeks from Maidstone Borough Council. It is not clear to the County Council whether this information has been formally accepted by Maidstone Borough Council, as Local Planning Authority, and what the status of this information is or whether this information has been or will be published. Any information provided by the Borough Council must be made available as part of the Examination Documents for transparency and fairness.

In light of the above, the County Council would respectfully request the Inspector ensure that enough time is made available in advance of any hearing session to allow sufficient evidence to be submitted and for all issues to be assessed in a fair, open and transparent manner. The County Council understands that Maidstone Borough Council will be issuing an updated Statement of Common Ground prior to the resumption of the hearing sessions. This

will reflect the proactive approach taken by both authorities in addressing these outstanding matters.

In summary, the County Council would raise the following key issues, which are provided in more detail within this Statement:

- **Local Highway Authority:** There remains significant omissions within the evidence base demonstrating the impact of the garden settlements on the highway network, and consequently, the necessity and deliverability of mitigation measure. In the case of the highway mitigation for the Heathlands Garden Settlement, work is very much ongoing and the County Council awaits the submission of further information by Maidstone Borough Council as site promoter which will require a considered review by the Local Highway Authority.
- **Education Planning Authority:** Concerns raised within the County Council's previous Written Statement in respect of adequacy of education provision to support the Local Plan remain. Furthermore, there is conflicting evidence provided to the Examination regarding the timing of the delivery of secondary school provision at Heathlands Garden Settlement.
- **Minerals and Waste Planning Authority:** Clarification is required to be submitted to the Examination regarding the scale of any imports needed for low level restoration at the Chapel Farm site.
- **Lead Local Flood Authority and Biodiversity**: The Heathlands Nutrient Mitigation Analysis Memo Per Capita Consumption rate should be decreased to deliver lower nutrient levels in the borough. Achievability of proposed mitigation measures must be confirmed to allow for considered Habitat Regulations Assessment conclusions to be reached.

Notwithstanding the above, the County Council, as Local Highway Authority, Education Planning Authority, Lead Local Flood Authority and Minerals and Waste Planning Authority have provided the following response in respect of the new evidence that has been provided to the Examination:

Matter 2: The Borough Spatial Strategy

Issue 3: Whether the proposed spatial strategy is justified, effective, positively prepared and consistent with national policy, including in terms of the distribution of development across the Borough and the assignment of places within the settlement hierarchy.

Q2.15 Has the Plan sought to appropriately maximise the potential of the existing urban area of the County Town of Maidstone for housing and commercial development including sustainable edge of settlement options? Do highways and secondary education capacity constrain potential growth in the Maidstone urban area?

Education Planning Authority: The County Council confirms that the submitted Written Statement submitted on 25 August 2022[1] responding to Q2.15, remains valid in respect of

[1] Kent County Council Written Statement (Ref: 1257414)

education and have not altered in response to any additional information provided to the Examination.

Matter 3: The Garden Settlements

Issue 2: Whether the proposals for a new garden settlement at Heathlands are justified, effective and consistent with national policy

- Heathlands Development Project Delivery Plan September 2022 (Updated) (ED46)
- Proposed Main Modifications to the Local Plan Review Documents (LPRSUB 011)

Q3.21 Does Policy LPRSP4(a) identify all appropriate and necessary infrastructure requirements? How will these be provided and funded?

Education Planning Authority: The statement and concern regarding delivery of necessary infrastructure remains as submitted within the Written Statement provided on 25 August 2022[2] as it relates to the Council's proposed Policy and Modifications. The County Council considers that the Heathlands Development Project Delivery Plan (ED46) has introduced an element of confusion regarding the Council's intention for infrastructure delivery.

The proposed modifications to LPRSP4(A) Heathlands (1) (a) state the 'Secondary school requirement established & land allocated' within Phase 2 of the development, by 2037 once a minimum of 1,400 units have been occupied. The policy also states: 'Secondary education provision delivered as necessary' within Phase 3 of the development by 2042 once 2,500 units have been occupied. If a secondary school were to be established along these timelines in line with that quantum of development, the delay to establishing a secondary school would lead to insufficient provision for approximately 350 secondary aged pupils for an unknown number of years, for which no school place is currently forecast to be available within the local or wider area.

The document produced by Homes England titled, Heathlands Development Project Delivery Plan September 2022 (Updated) (ED46) states that "Secondary school provision delivered as necessary" within Phase 2. The requirement for the new secondary school to be delivered is at approximately 750 occupations; the same number of homes intended to be delivered as part of Phase 1; if it is therefore the intention that the Local Plan Review will create a policy framework for the secondary school to be established at commencement of Phase 2, then this would be supported. Clarity is sought as to whether the Borough Council supports the site promoters indicative phasing within ED46 and intends to modify the submitted Plan to reflect this change in timing. The Submitted Plan, Main Modifications and Heathlands Development Project Delivery Plan September 2022 (ED46) currently all state different intentions for the timing of this piece of infrastructure and it is the view of the County Council that the weight that can be given to ED46 is limited as it reflects an evidence base document produced by the site promoter and has not altered the relevant policy. It is imperative that a policy requirement be introduced that supports and enables the

[2] Kent County Council Written Statement (Ref: 1257414)

establishment of a new secondary school by no later than 750 occupations, without which there is not forecast to be sufficient school places in the area.

Matter 3: The Garden Settlements

Issue 2: Whether the proposals for a new garden settlement at Heathlands are justified, effective and consistent with national policy

- Position Paper (ED45)
- Heathlands Development Project Delivery Plan September 2022 (Updated) (ED46)

Local Highway Authority: It is noted that the Project Delivery Plan (ED46) presents updated indicative delivery milestones for the development. The County Council, as previously indicated in relation to Question 3.18, is supportive of the inclusion of the new rail station in the first phase of development as this provides the best opportunity to encourage sustainable travel behaviours[3]. This approach is also consistent with paragraph 99 of the Position Paper (ED45), which identifies the opening of the new rail station in the first phase of development to be the preferred solution.

The updated milestones and associated viability assessment do not provide further clarity on the funding and delivery of the other transport infrastructure measures that would be necessary to support the development. This includes mitigation measures at M20 J8/J9 and on the A20, to the west and east of the site, and A249 road corridors and the bus services that would operate alongside or instead of the new rail station.

The County Council maintains the view that this is a significant omission and, when viewed in the context of Questions 3.21 and 3.22, the additional evidence does not justify the transport infrastructure phasing timetable defined in the proposed policy modification. The County Council's concerns regarding the soundness of this timetable therefore remain unresolved.

Matter 3: The Garden Settlements

Issue 3: Whether the proposals for a new garden settlement at Lidsing are justified, effective and consistent with national policy

- Traffic Impact Assessment (ED53B)
- Infrastructure Proposals (ED53C)
- Sustainable Transport Strategy (ED53A)

Local Highway Authority: The County Council has reviewed the additional transport evidence in relation to the proposed Lidsing garden settlement. Overall, this provides a fuller understanding of the infrastructure requirements that will be required to mitigate its impact; however, some previously raised concerns remain.

[3] Kent County Council Written Statement (Ref: 1257414)

It is noted that the primary purpose of the evidence is to identify the transport infrastructure required to support the build-out of the garden settlement over the plan period to 2037.

When viewed in the context of Question 3.37 concerning the effectiveness of the policy framework, it is apparent that the evidence does not justify the transport infrastructure phasing timetable defined in the proposed policy modification. The County Council's concerns regarding the soundness of this timetable therefore remain unresolved.

Both the Traffic Impact Assessment (ED53B) and Infrastructure Proposals (ED53C) reports helpfully address Questions 3.40 and 3.41 in how they reinforce the imperative of achieving primary access to the site via M2 J4. They support the County Council's view that connectivity to M2 J4 should form part of a package of measures that will minimise the potential for additional traffic movements on minor roads in the vicinity of Bredhurst and Boxley.

Paragraphs 3.3.22 – 3.3.24 and 3.3.31 of the Traffic Impact Assessment (ED53B) highlight how the development proposals include road connections to Lidsing Road, Forge Lane and Maidstone Road. The travel demand methodology described in paragraphs 3.3.24 – 3.3.31 then describes how route choice assumptions have been applied to account for the proposed design constraints on these connections that would be expected to reduce their attractiveness as routes for travel.

The evidence provides limited detail on the nature and scope of the proposed design constraints. Furthermore, no confirmation is provided on the intended funding arrangements and timing of implementation.

There are references to prioritising walking and cycling on Forge Lane in paragraph 4.2.15 of the Sustainable Transport Strategy (ED53A) and traffic calming on The Street/Maidstone Road corridor in paragraph 3.3.31 of the Traffic Impact Assessment (ED53B). Paragraphs 5.1.3 – 5.2.3 of the Infrastructure Proposals (ED53C) also indicate how the access junctions with Maidstone Road could be configured to prioritise movement to/from the development.

It is noted that the applied route choice assumptions, referred to as 'cost penalties' in paragraphs 3.3.22 – 3.3.31 of the Traffic Impact Assessment (ED53B), have not been explicitly defined. They have resulted in forecast traffic reductions in both Bredhurst and Boxley, as summarised in paragraphs 4.4.2 and 4.4.6 – 4.4.8.

In responding to Question 3.46, the County Council has previously highlighted how the traffic modelling undertaken using the Kent Transport Model (LPR 5.2) had indicated an increase in traffic flows through both Bredhurst and Boxley. The new evidence is, therefore, inconsistent with the County Council's findings.

The County Council is mindful of paragraph 4.1.5 of the Traffic Impact Assessment (ED53B), which draws attention to the limitations of the new modelling evidence when appraising impacts on this part of the highway network. It also acknowledges the robustness of the modelling already undertaken by the County Council, which has accounted for the full build-out of the garden settlements.

The County Council maintains the view that further detailed assessment work will need to be undertaken in respect of the highway network at Bredhurst and Boxley. In order to address Question 3.45, this must provide a robust understanding of the potential traffic impacts and identify how mitigation measures will be funded and delivered in a timely manner.

It is noted that paragraph 5.4.11 of the Traffic Impact Assessment (ED53B) acknowledges the need for further traffic modelling in relation to the highway network at M2 J3, Lord Lees Roundabout and A2045 Walderslade Woods. This carries further relevance to Question 3.45 in view of the worsening congestion forecast to occur on several of the junction arms, as described in paragraphs 5.4.10 – 5.4.15. The County Council maintains the view that the funding and timely delivery of mitigation measures will need to be identified as part of the further assessment work.

To enhance the sustainability credentials of the development, the proposed extension of the Maidstone – Rainham bus service (no. 130) referred to in paragraph 6.3.7 of the Sustainable Transport Strategy (ED53A) would need to incorporate upgrades to its frequency and duration of operation. This reflects the current limitations of the service, which only runs six times per day on a weekday and four times a day on a Saturday.

In summary, whilst the County Council supports the overall development strategy for the Local Plan in that it has been assessed through a strategic transport model, the absence of the required more detailed modelling, the identification of specific mitigations designed to outline stage appropriate to a Local Plan and absence of costings remain a significant concern. This is particularly the case for the proposed Heathlands Garden Settlement. It is recommended that more time is needed for the promotors to produce the necessary highways evidence to enable the County Council to confirm that the plan is sound in the context of the requirements of the National Planning Policy Framework.

Matter 4 Strategic Development Locations

Issue 2: Whether the Invicta Barracks is justified as a strategic development location within the plan period and whether the policy framework at LPRSP5(b) would be effective and consistent with national policy in securing sustainable development?

Q4.18 Is the policy sufficiently clear regarding any on-site education infrastructure?

Education Planning Authority: The County Council confirms that the submitted Written Statement submitted on 25 August 2022[4] responding to Q4.18, remains valid in respect of education and have not altered in response to any additional information provided to the Examination.

[4] Kent County Council Written Statement (Ref: 1257414)

Additional Evidence

- Letter from Brett Group (minerals extraction Heathlands) to Inspector Spencer (ED43)
- Heathlands - Refined Minerals Resource Assessment (ED44)
- Further clarification in respect of the above has been provided to the Mineral and Waste Planning Authority in the form of an email from William Cornall, Director of Regeneration and Place dated 10th October 2022.

Minerals and Waste Planning Authority: The County Council, as Minerals and Waste Planning Authority notes that the relevant further submissions in terms of landwon mineral safeguarding are a Letter from Brett Group to Inspector Spencer (ED43) and a Heathlands - Refined Minerals Resource Assessment (ED44). These detail how the permitted reserves at Lenham Quarry and Burleigh Farm will be extracted, enabling Chapel Farm (west) to be worked for minerals prior to other development taking place. Essentially, the case is made in the Letter from Brett Group to Inspector Spencer (ED43) that the minerals (permitted and allocated but not yet permitted) will be able to be extracted without compromising the development phasing of the new garden settlement allocation in the submission Maidstone Local Plan.

Importantly, the Minerals and Waste Planning Authority has been advised by Maidstone Borough Council (Director of Regeneration & Place[5]) that Lenham Quarry and the proposed Chapel Farm quarry are no longer proposed to be backfilled. KCC notes that the submitted Heathlands - Refined Minerals Resource Assessment (ED44) now proposes that any application would need to accord with Kent Minerals and Waste Local Plan Policy DM 19 (Restoration, Aftercare and After-use), and also recommends that a revised restoration scheme remains that of low-level restoration, to minimise the need to import and engineer fill material, therefore supporting a sustainable approach. For Chapel Farm, Maidstone Borough Council recommends low-level restoration to reduce the requirement to import fill materials and to achieve a stable development platform. There are no details of the scale and quantity of any restoration materials and the timings involved - these will need to be of an insignificant volume and provided such that it does not affect the delivery of the dates below.

The County Council has the benefit of more recent Aggregate Monitoring information based on sales and reserves at the operational sites, which demonstrate the following:

- Lenham Quarry - reserves are almost exhausted for all intents and purposes;

- Burleigh Farm (Charing Quarry extension) - based upon current draw down rates, the quarry is expected to be exhausted in 2027;

Chapel Farm (allocation unpermitted) - 3.2mt of potential reserves, anticipated to only come on stream post Burleigh Farm as required by the Mineral Sites Plan, using the same draw down rate as Burleigh Farm, total extraction would occur in 2039. It is therefore a reasonable argument that by 2034, sufficient mineral would have been extracted to enable restored land

[5]The County Council understands that the Director of Regeneration and Place is acting on behalf of MBC as promotor for the Heathlands proposal, as opposed to Local Planning Authority.

to be available for development. Phase 4 of Heathlands is not required until 2040, which is in phase with the total extraction of Chapel Farm's mineral allocation. This is contingent on the site not being backfilled with materials to regain the original land levels, which now appears to be the case from clarification provided by the Borough Council (Cornall 10/10/22), although the final restoration levels are currently unknown and dependent upon detailed design work. The Borough Council has advised that the level of restoration will be governed by many factors, but principally by the elevation of the groundwater table and surface water, as there will be a need to retain an unsaturated zone to enable the construction of drainage, foundations, infrastructure and to mitigate the risk of flooding.

Therefore, it is assumed from the content of the Letter from Brett Group to Inspector Spencer (ED43) that the land at Chapel Farm quarry would be made suitable for development without needing to import significant materials, and that the original top and sub-soils would be available for site remediation post extraction of the mineral reserves.

The phased development timescale quoted above is achievable, provided that the local rates of mineral extraction (circa 300t tn pa) do not substantively reduce and if needed (as implied above), any restoration material imported to the Chapel Farm site are timely and insignificant in volume. Whilst achievable, the degree of flexibility in bringing forward the garden settlement development and the necessary mineral extraction, to ensure mineral safeguarding requirements are met, appears limited. It is noted that the Heathlands - Refined Minerals Resource Assessment (ED44) does not look at varying economic scenarios of increased or decreased mineral extraction rates and any contingencies that may then be required. The document, however, provides a reasonable basis for certainty that mineral safeguarding policy will not be compromised, with the caveat that it is dependent on no significant restoration material importation and that mineral extraction rates to the local market remain consistent in the future (or increases). It would be beneficial to have a greater understanding of the scale of any imports needed for low level restoration at the Chapel Farm site.

- Letter from Natural England: Heathlands - Nutrient Neutrality Assessment and Mitigations Proposals (ED35)

Biodiversity: The County Council recognises that additional evidence has been submitted in relation to the Habitats Regulations Assessment. In particular, the Letter from Natural England: Heathlands – Nutrient Neutrality Assessment and Mitigations Proposals (ED35) has raised a number of comments regarding the proposed mitigation, that need to be addressed. To enable the Habitat Regulations Assessment to be able to conclude that there will be no adverse impacts on the Stodmarsh Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar, there needs to be certainty that the proposed mitigation is achievable.

- Heathlands Nutrient Mitigation Analysis Memo (ED36)

Lead Local Flood Authority: The County Council, as Lead Local Flood Authority, acknowledges the updated Heathlands Nutrient Mitigation Analysis Memo (ED36) provided by Arcadis on behalf of Homes England and Maidstone Borough Council, although the amends which have been made are not clearly identified. It is noted that the calculations for

total wastewater volume are based on a Per Capita Consumption rate of 120 litres per person per day, which is relatively high. KCC would recommend that this is decreased to at least 110 litres per person per day. This would benefit Kent as a water scarce area as well as delivering lower nutrient levels in the borough.

If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,

Simon Jones
Corporate Director of Growth, Environment and Transport

This page is intentionally left blank

Growth and Communities

Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Phone: 03000 415320
Ask for: Claire Pamberi
Email: claire.pamberi@kent.gov.uk

3 October 2022

David Whittington
Folkestone and Hythe District Council
Civic Centre
Castle Hill Avenue
Folkestone
Kent
CT20 2QY

BY EMAIL ONLY

Dear David,

Re: Folkestone and Hythe District Council Community Infrastructure Levy Draft Charging Schedule

Thank you for consulting Kent County Council (KCC) on the Folkestone and Hythe District Council (FHDC) Community Infrastructure Levy Draft Charging Schedule.

Kent County Council (KCC) was pleased to participate in officer discussions regarding FHDC's review of its adopted CIL Charging Schedule.

The County Council welcomes the acceptance. of KCC's request to exclude education from the County's agreed list of CIL funded infrastructure at paragraphs 3.6 and 3.7 of the *CIL Infrastructure Funding Gap Statement*. KCC is clear that Section 106 is the appropriate mechanism for securing developer contributions towards the delivery of necessary education infrastructure.

Going forward, financial contributions to the Local Education Authority via section 106 planning obligations will be required to make proposed development acceptable in planning terms. This will ensure the development is fully accountable for its impacts.

KCC is in agreement with FHDC's inclusion of the additional text within its *Draft CIL Charging Schedule* at paragraphs 4.2 and 4.3 as follows:

> *4.2 In respect of education infrastructure, Kent County Council have advised that: "Section 106 is the appropriate mechanism for securing developer contributions towards the delivery of necessary education infrastructure and this is reflected in the FHDC CIL*

Infrastructure Funding Statement schedule. Accordingly, KCC will not use any component of its proportionate share of CIL receipts[1] to fund education infrastructure."

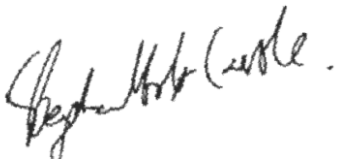
4.3 The corresponding figures for education infrastructure are presented in Table 2 of the Infrastructure Funding Statement, albeit that the education infrastructure figures are not carried forward into the total values in Table 2 as KCC will not be utilising their proportionate share of CIL receipts to fund education infrastructure.

KCC acknowledges that the revised version of the CIL Charging Schedule will be submitted for examination in due course.

In addition to the inclusion of the wording above, KCC separately seeks assurances from FHDC that a joint statement or memorandum of understanding will be entered into by both parties to formalise this arrangement. KCC would ask that this is in place by the time the CIL Charging schedule is adopted.

If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,

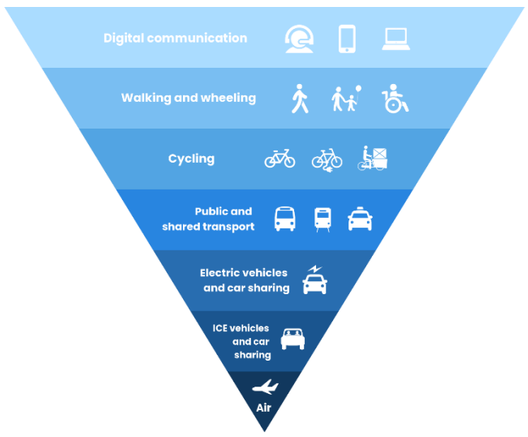


Stephanie Holt-Castle
Director of Growth and Communities

[1] As set out in the adopted CIL Governance Framework the District Council assigns 35% of CIL receipts to Kent County Council (KCC) in order to enable KCC to spend this proportion of the receipts in accordance with their own priorities.

Tonbridge and Malling Local Plan Regulation 18 Consultation.
Kent County Council Response (October 2022)

Policy/Paragraph	Commentary
1. Introduction	
	The County Council recognises that the Borough Council is at the early stages in producing it's Local Plan and appreciates the opportunity to comment early in the Local Plan process. It is noted that within this Regulation 18 consultation, although growth strategies are presented, the Borough Council is not giving any indication at this stage as to whether it has a preferred growth strategy. It is noted that Appendix B provides a list of proposed sites, and aside from initial consideration of these sites within the Interim Sustainability Appraisal Report, there is little consideration as to whether these sites are actually suitable for development. The County Council's response has provided initial commentary on all of the proposed growth strategies put forward but given the lack of detail available for the options presented, this response is not providing detailed feedback or a preferred strategy at this stage. KCC would welcome continued discussions as a preferred growth strategy emerges. The County Council has highlighted that spatial strategy options which propose focusing growth allocations within one area of the Borough are likely to result in considerable infrastructure pressures in the area, unless the development proposed is able to provide critical mass to meet it's own infrastructure need. To deliver sustainable development, close working and a collaborative approach with all key stakeholders will be crucial – taking in to account all necessary infrastructure and services required to deliver robust and resilient communities during the plan period and beyond within the Borough – whilst also considering any cross boundary, strategic implications of growth. The County Council would therefore welcome continued engagement as the growth strategy for the Borough is developed and sites are identified for allocation. The County Council is committed to working with the Borough Council and other key stakeholders to ensure that sustainable growth is supported by necessary infrastructure – that is planned for, funded and delivered in a timely manner, ahead of housing / commercial growth where required – ensuring an 'Infrastructure First' approach to development. An "Infrastructure First" approach is embedded in the Kent and Medway Infrastructure Proposition, a proposal that seeks to enable accelerated housing delivery, which is focussed on building the right homes in the right places and providing the public services, transport infrastructure, jobs and homes that residents will need now and in the future. As the Local Plan progresses, the County Council would value timely engagement in the shaping and inputting, as appropriate, into the draft Statement of Common Ground to ensure that all cross-boundary and strategic matters are properly and clearly addressed. The response provides general commentary on the relevant sections of the Local Plan. KCC Officers have also sought to provide summary of specific requests for sections and would be willing to discuss the specific requests, and the matters raised in the general commentary further as the Local Plan progresses.
2. Local Context	
2.1 What is the spatial portrait of the borough?	Public Rights of Way (PRoW) The County Council is keen to ensure that it's interests are represented in respect of its statutory duty to protect and improve PRoW in the county. The County Council committed to working in partnership with local and neighbouring authorities, councils and others to achieve the aims contained within the KCC Rights of Way Improvement Plan (ROWIP) and the KCC 'Framing Kent's Future' strategy for 2022-2026. KCC intends for people to enjoy a high quality of life with opportunities for an active and healthy lifestyle, improved environments for people and wildlife, and the availability of sustainable transport choices. PRoW is the generic term for Public Footpaths, Public Bridleways, Restricted Byways, and Byways Open to All Traffic. The value of the PRoW network is in providing the means to realise many objectives of the Local Plan being consulted upon - as examples, the PRoW network can enhance community connectivity and cohesion; improve local environments by reducing local traffic congestion and improving air quality; support personal health and well-being of individuals and groups; and support local economies, whether in providing passing trade such as with a cafe, or larger supply businesses as with cycle or equestrian users. The County Council recommends that the Local Plan has more positive regard to the PRoW Network and explicitly references the ROWIP to ensure that partnership working continues to deliver improvements to the PRoW network. The ROWIP is a statutory strategic document that aims to provide a high quality, well maintained public rights of way network, that will support the Kent economy, encourage active lifestyles and sustainable travel choices and contribute to making Kent a great place to live, work and visit. In consideration of the above, the County Council would therefore recommend that in Table 1 'Spatial Portrait', the 577km of PRoW which exists in the Borough be considered and referenced as an asset. *Specific requests for section 2.1:* • *The Local Plan should have more positive regard to the PRoW network.* • *Consideration and explicit reference should be made to the ROWIP.*

Policy/Paragraph	Commentary
	• *Table 1 'Spatial Portrait' should reference the PRoW network as an asset of the Borough.*
4. Spatial Distribution of Development	
4.2. How should development be distributed across the borough?	At this stage, the County Council is not providing a detailed assessment of each of the growth strategies proposed given the high level nature of the consultation, but does note that a preferred growth strategy is not identified by the Borough Council. The County Council, as a key infrastructure provider would emphasise that any growth strategy progressed will need to be supported by adequate infrastructure. This could be through improvements made to existing infrastructure (including key services and facilities), or through the development of new infrastructure to support the new communities. Either way, growth in the Borough must be supported by infrastructure that is planned for, funded and delivered in a timely manner. In respect of County Council services below, an initial view is provided in respect of the impact of the growth strategies proposed, and the potential considerations for the Borough Council when progressing the Plan towards a preferred growth strategy. <u>Highways and Transportation</u> The County Council, as Local Highway Authority, notes that at this stage in the Local Plan process, only high level questions regarding the Borough's growth strategy are being considered. KCC would welcome engagement as more detail emerges regarding potential development sites to better understand potential highway impacts and necessary mitigation measures to support sustainable growth. The County Council, as Local Highway Authority notes that areas which, from a highway perspective offer the most sustainable growth solutions include those which have rail and frequent bus services already in place, are close enough to amenities to offer active travel (walking and cycling modes) solutions, yet still offer car travel (although car should not be the preferred choice). The Borough Council should also consider the potential for Active Travel to have wider environmental benefits, for example improving air quality as well as health and wellbeing benefits from new and existing communities. The County Council would also draw attention to the Highway Code, which is placing higher priority on cyclists, pedestrians and horse riders in the hierarchy of road users - in cohesion with the Energy Saving Trust graphic below:  <u>Infrastructure Development</u> The County Council acknowledges the Borough Council's understanding that housing affordability is one of the issues affecting the Borough and encourages consideration of how the Local

Policy/Paragraph	Commentary
	Plan can provide innovative solutions for this issue. The County Council notes that for growth and the provision of infrastructure, it can be more effective if development is allocated within the most sustainable locations in the Borough, where allocations have access to existing infrastructure that has the capacity to meet the needs of the growth or can reasonably be expanded; or where allocations can support the delivery of new local and strategic infrastructure to support growth. These focused areas for growth will likely offer better opportunity to deliver more strategic infrastructure. The County Council does not consider it desirable to focus development only in the north of the Borough as it will place a considerable strain on infrastructure in the area, nor a more dispersed approach – where there is not the critical of mass of development to deliver the infrastructure to support the new and existing communities. Overall, the County Council would draw attention that all growth must be supported by necessary infrastructure to ensure sustainable and resilient communities. As an advocate for 'Infrastructure First', the County Council requests that infrastructure is planned for, funded and delivered in a timely manner to support growth and would welcome engagement with the Borough Council at this early stage to ensure sustainable growth, supported by the necessary infrastructure, is delivered through the Local Plan. <u>Education</u> The County Council as the Local Education Authority has a statutory duty to ensure that a school place is offered to every child in the county that requires one. A significant element of discharging this duty is working with Local Planning Authorities to ensure additional school provision is integrated within housing growth over the medium and long term, ensuring sustainability of growth. School provision as infrastructure is 'lumpy' in that additional school places can typically only be commissioned in set quantities at a time, for example 30 additional reception places in an existing primary school, it is not typically possible for schools to expand by less than a Form of Entry (210 pupils across Years R-6 at Primary or 150 at Years 7-11 at secondary). Due to this commissioning constraint, a spatial strategy which allocates housing across many areas, such as existing settlements, can mean that additional school places required to accommodate increased demand may have to be provided strategically in a different geographic location if growth within one small geographic area doesn't create the critical mass to justify and support the expansion of an existing school or the establishment of a new one. This is largely almost always the case for secondary provision outside of the establishment of a new large settlement, but can also be applicable to primary provision depending on the scale of proposed development. Options 4 and 5 are characterised by development across a wide range of existing settlements across the Borough, this approach to development is unlikely to allow for additional education provision to be provided in all areas of housing growth; for example, with growth across several villages it may be necessary for a single existing school in one village to expand in response to growth in a collection of existing settlements. This, however, does not mean that additional school places could not be provided, it does however mean that the impact of a proposed strategy should be assessed in full, such as travel to school patterns that may result and the impact on local highway networks. Options 1, 2 and 3 focus development largely around existing urban areas; this approach is generally less likely to mean that the areas of growth don't have access to an existing school nearby, but detailed assessment would need to be undertaken to establish whether the existing schools could be expanded or whether alternative options of providing capacity would need to be explored. The County Council as Education Authority is not expressing a preference or objection to any of the options consulted, however it is important that the Borough be cognisant to the dynamics, challenges and potential opportunities of each of the options with regards to school provision. It will be essential for the two authorities to work closely together to ensure there is sufficient education capacity for the growth within the Local Plan, this will require exchange of information such as the number of dwellings proposed in each area and under different scenarios. It will also be essential that the Local Plan integrates, supports and unlocks additional school provision through the allocation of land for education use where necessary and a policy requirement for the capital cost of new and expanding schools to be met by development. As Local Education Authority, KCC looks forward to working with the Borough Council on this detail and request that cooperative work takes place well in advance of any further consultation on the Local Plan. <u>Minerals and Waste</u> The County Council, as Minerals and Waste Planning Authority notes that the Borough contains important safeguarded deposits of aggregate forming minerals, including: - Sub-Alluvial River Terrace Deposits and River Terrace Deposits (including one allocation in the Kent Mineral Sites Plan) - Folkestone Formation (a highly important aggregate resource actively being extracted and with significant resources running through the Plan area) - Limestone-Hythe Formation and the Sandgate Formation (as indicated on the Mineral Safeguarding Areas map for the Tonbridge and Malling Borough area)

Policy/Paragraph	Commentary
	In addition, there are safeguarded mineral handling, processing and transportation facilities including the East Peckham Rail depot and waste management facilities in the area. The County Council notes that most sites which could be allocated as part of the five growth options proposed could have land-won minerals safeguarding issues. KCC notes the reference made within the Local Plan to the Kent Minerals and Waste Local Plan 2013-30. The County Council recommends that the existence of safeguarded land-won minerals and waste and minerals infrastructure is investigated as part of considerations of site allocations. Proposed development sites should be assessed against any of the exemption criteria as set out in the policies DM 7: Safeguarding Mineral Resources and DM 8: Safeguarding Minerals Management, Transportation, Production & Waste Management Facilities of the Kent Minerals and Waste Local Plan 2013-30 (Early Partial Review 2020). The County Council, as Minerals and Waste Planning Authority, would welcome engagement to assist in how the assessments should be undertaken. The County Council would also recommend consideration of the Safeguarding Supplementary Planning Document (2021). Waste Management The County Council, as Waste Disposal Authority note that any growth in the Borough will result in further demand KCC's Waste Disposal Service. Collection rounds from the Borough are currently split with those in the North and East being taken to the Allington Waste Transfer Station (WTS) and those in the South and West taken to the North Farm WTS in Tunbridge Wells. The County Council has highlighted a current lack of capacity at the North Farm WTS as of particular concern and something that will require mitigation to enable a sustainable service to operate in the future. Allington WTS is currently coping with the level of demand placed upon it; however, there is only a small opportunity for growth before vehicle numbers become prohibitive to its efficient operation. The County Council, as Waste Disposal Authority, considers that development focused in the north of the Borough, as shown in Growth Strategy Option 1, would place significant demand on the operation of the Allington WTS and additional capacity at this WTS would be required. Conversely, Option 2, which indicates significant expansion of Tonbridge, would exacerbate the existing capacity issue at North Farm WTS. This facility would need to be expanded or re-located to a larger site (although it should be noted that existing site constraints make expansion difficult). If a new settlement is delivered as proposed in Option 5, this would place great pressure on waste disposal infrastructure and the County Council would seek a new WTS facility to serve the new settlement. Overall, the County Council, as Waste Disposal Authority, would like to see development pressures spread between the existing facilities, with balanced growth in the Borough to ensure necessary waste disposal infrastructure has the capacity to support growth in the Borough. *Specific requests for section 4.2:* • *The Local Plan should consider potential for Active Travel opportunities through the Local Plan.* • *The Borough Council should take account of the Highway Code priorities for travel when assessing proposed development allocations.* • *Consideration required and innovative solutions should be sought through the Local Plan to tackle housing affordability challenges affecting the Borough.* • *infrastructure first approach to development, ensuring that for the preferred spatial strategy, necessary infrastructure can be planned for, funded and delivered in a timely manner to support sustainable growth.* • *The existence of safeguarded land-won minerals and waste and minerals infrastructure is investigated as part of considerations of site allocations.* • *Recognise and work with the County Council to ensure that increased demand on waste management infrastructure is mitigated accordingly.*
5. Strategic Matters	
5.1 What are the strategic matters that the Plan needs to be addressed	Minerals and Waste The County Council notes that reference has been made to the Kent Minerals and Waste Local Plan but would further recommend that the existence of minerals in the Borough is considered as a strategic matter within this section. *Specific requests for section 5.1:* • *Existence of safeguarded minerals is considered a strategic matter within the Local Plan.*
5.5 Transport – what are the issues	PRoW The County Council recognises that opportunities to promote walking, cycling and public transport use are identified in the Local Plan, however, it is advised that the PRoW network is

Policy/Paragraph	Commentary
	specifically referenced. KCC would recommend that in respect of paragraph 5.5.3, consideration should also be had to the ROWIP. In reference to the role of the County Council in paragraph 5.5.8, KCC is the Local Highway Authority for the PRoW network and therefore has a wide range of responsibilities. This includes involvement in all legal processes and aims to create a network that provides a safe, sustainable means of travel but also delivers the benefits that access to the network, countryside, coast and green spaces can make to improve the quality of life for Kent's residents and visitors. The proposed Active Travel Strategy (LCWIP) in paragraph 5.5.14 must include the PRoW network, with specific recognition of PRoW as a valuable component of active travel. It is noted that the County Council has been engaged on the production of this Active Travel Strategy to date. KCC supports the objective in paragraphs 5.5.19 and 5.5.20, for development proposals to show commitment to encouraging modal shift from short car journeys and towards active travel. The County Council would recommend that the ROWIP is included here as KCC policy regarding PRoW, walking, cycling and equestrian use incorporation within development. The County Council agrees with the risks presented in paragraph 5.5.25 regarding a failure to shift to sustainable transport modes and would draw attention to the aims and objectives of the ROWIP to reduce these. Within paragraph 5.5.26, the County Council would request that reference is made to the 'PRoW network' as opposed to *"*Footpath Network*"*. Enhanced connectivity for walking, cycling and equestrian activity across the borough, provides a range of sustainable transport options available for the public and opportunities to access high quality open space. While the existing PRoW resource provides extensive opportunities for active travel and outdoor recreation, there are gaps in the network and accessibility issues that need to be addressed. Future growth and development should help to address these issues and enhance the PRoW network, so that the benefits of this access resource can be maximised by residents and visitors. The County Council is supportive of the matters set out within paragraph 5.5.28. *Specific requests for section 5.5:* • *Reference to the PRoW network in respect of transportation considerations within the Local Plan.* • *Consideration of ROWIP in respect of paragraphs 5.5.3, 5.5.19 and 5.5.20 .* • *LCWIP must include the PRoW network, with specific recognition of PRoW as a valuable component of active travel.* • *Reference to footpath network to be amended to PRoW network in paragraph 5.5.26.*
5.7 Retail – what are the issues?	The County Council would suggest that achieving the right balance of quality, quantity and distribution of retail is vital in supporting and protecting local centres. To support local centres, the County Council supports a strategy that promotes enhanced accessibility and offers an holistic environment for retail, leisure, social and community uses. Walking, cycling and accessibility to town centres, local centres and rural facilities must be ensured, in order to encourage modal shift away from short car journeys for local needs. Cultural infrastructure is also an essential feature within a town or local centre to create a vibrant mix of uses. It can be delivered as multifunctional spaces that offer opportunities for community services and affordable creative workspaces to support small businesses and freelancers, alongside cultural offerings. The cultural sector also provides local employment opportunities, with the role of higher and further education facilities developing skills in the cultural and creative industries. The Local Plan should therefore consider the delivery of necessary cultural infrastructure to support sustainable development in the Borough. The County Council encourages the use of art in design to create a sense of place and identity in both new and existing communities. The County Council, in partnership with The Creative Estuary Partnership, is producing a Cultural Planning Toolkit through a commission led by the Town and Country Planning Association and Urban Roots Consulting. The County Council would welcome further discussions with the Borough Council in respect of cultural infrastructure and the potential of this Toolkit. *Specific requests for section 5.7:* • *Consideration the delivery of necessary cultural infrastructure to support sustainable development in the Borough.* • *Consideration of opportunities to access town centres, local centres and rural facilities using sustainable modes of transport.*

Policy/Paragraph	Commentary
5.8 Community facilities and infrastructure – what are the issues?	Infrastructure Development *Paragraph 5.8.9* KCC notes the Borough Council's acknowledgement of the use of Section 106 agreements to secure funding for infrastructure – whilst also recognising the Government's proposals to introduce a new mandatory infrastructure levy – although the details and delivery timings of this levy remain unclear at the time of writing. For the time being, it will be important to plan strategically for infrastructure under Section 106 planning legislation. KCC would strongly welcome the Borough Council's continued support to deliver necessary infrastructure using Section 106 agreements for Education, Community Learning, Libraries, Youth Services, Adult Social Care, Waste and Broadband infrastructure – which are referred to in more detail below: *Education provision* KCC is very keen to ensure that education infrastructure is afforded key prioritisation in the list of funding requirements via section 106 agreements within the emerging Local Plan. Education is fundamental to community development. Children living in new developments as well as in existing communities will need school places, which require careful, strategic planning by the County Council as Education Planning Authority. The County Council is aware of substantial, evidenced pressures on the primary and secondary education need, particularly within the North of the Borough. Broadwater Farm was identified within the previous, now withdrawn Local Plan as a strategic site for the delivery of secondary education and is also referred to at para 5.8.7 (page 61), which is welcomed. While KCC hopes this site remains an opportunity, the County Council would welcome engagement with the Borough Council to ensure sites are identified to meet educational needs. It is essential that the full costs of infrastructure provision are mitigated by developments. In the case of education infrastructure, this includes the cost of education land where schools are being developed. Any and all developments where a pupil place pressure is generated must be required to contribute towards the mitigation of both education build and land costs where these arise. *Early years* As set out within the Kent County Council Education Commissioning Plan, assessing the childcare market and ensuring sufficiency and long-term viability of provision for early years is both complex and presents a significant challenge for local authorities. The County Council (commissioned through The Education People) is required to work with providers in making available a sufficient range of flexible provision, in the right geographical areas, at the right times and offering the right sessions to fit with both standard and atypical working pattens. The County Council would welcome engagement with the Borough Council to ensure adequate early years provision is provided to support growth. The Borough Council should work closely with developers/promoters to consider opportunities for early years settings to be integrated within areas of new development, particularly into new or expanding communities. *Adult Social Care* KCC would welcome the Borough Council's continued support for Adult Social Care, particularly as the county's population continues to age and the nature of social care needs becomes more complex. The County Council is encouraged by the Local Plan references within paragraph 5.8.8 - ***"****Healthy, safe and prosperous communities…* being a *key for the vision of the borough, supported by the right infrastructure in the right places".* Adult Social Care primarily concerns social work, personal care, and practical support for adults (18 years+) with a physical disability, learning disability, physical or mental illness. It also includes safeguarding for those at risk of harm and abuse, as well as support for unpaid carers. A key priority of the service is to enable residents to live independently and stay well and safe in their own communities for as long as possible. Consequently, Adult Social Care services may include support in people's own homes (home care or 'domiciliary care'); support in day centres; support in specialist accommodation and 'reablement' services to help people regain independence; providing aids and adaptations for people's homes; providing information and advice; and providing support for family carers. For those unable to stay in their own homes, services may be provided via care homes and nursing homes ('residential care'). *Libraries* KCC is encouraged that the Borough Council has consistently shown its support for libraries in its requests for section 106 planning obligations. KCC would respectfully ask that this continues

Policy/Paragraph	Commentary
	and potentially incorporated into Local Plan policy to ensure that the bookstock, equipment and services to keep the libraries service as a valued resource is maintained, and that opportunities to enable social mobility for Kent's residents is maximised. In addition to book lending, KCC libraries provide free access to PCs and public Wi-Fi; help for job seekers; a range of free physical and digital activities for all ages - for example baby rhyme time, talk time, book groups, craft clubs, and after school homework help; a mobile library service for smaller, more remote communities; study spaces; a Home library delivery service and Red Book box service to care homes; business resources; registration services and community space for group activities. *Community Learning and Skills* The Borough Council has continually been supportive of the provision of planning obligations to support Community Learning and Skills (CLS). The CLS vision is to 'help every adult and young person in Kent to achieve their potential in life, whatever their background'. In collaboration with other skills and education services in Kent, CLS's priority is to support the following groups: - Adults seeking skills for employment. - Young people entering the world of work - Organisations seeking to improve the skills and potential of their staff - Adults learning for personal development, pleasure, and wellbeing - Families (especially those in Kent's disadvantaged neighbourhoods). In addition to increasing skills and educational attainment, participation in CLS programmes can help those moving into new developments to overcome social isolation and encourages community cohesion, both within the new development and wider area. The County Council would welcome consideration of this service within it's Local Plan policy as may be appropriate. *Waste Management* The County Council welcomes reference to the need to implement measures through the Local Plan to minimise waste. However, waste infrastructure continues to be a key infrastructure requirement to support sustainable communities for the effective disposal and recycling of waste, a service for which the County and Borough Council have significant roles . The support of planning obligations by the Borough Council in respect of KCC's need to enhance and replace its Household Waste Recycling Centre (HWRC) infrastructure has been inconsistent, even with KCC having consulted Borough and District Councils on the waste infrastructure need, which is acute given the scale of new housing development. On occasion, the Council notes that the Borough Council has not always supported the request for waste planning obligations which creates pressures on this key infrastructure provision. Housing growth across the county is increasing demand upon Household Waste and Recycling Centre (HWRC) and Waste Transfer Station (WTS) facilities, with many now needing to be replaced or expanded to meet capacity requirements. KCC's Kent Waste Disposal Strategy 2017-2035 sets out the current position, identifies future pressures, and outlines how KCC will maintain a sustainable waste management service. It references population and housing growth, budget pressures, market provision, current performance, legislation, and performance targets. KCC would kindly request the new Local Plan process supports the consistent request for planning obligations where there is an identified need for county waste infrastructure. *Youth Services* KCC has welcomed the Borough Council's support of planning obligations for youth services to date, which has been largely consistent. The provision of effective youth services is yet another example of giving young people the chance to be socially mobile. Youth services are delivered across Kent's districts via direct delivery and commissioned services, with central youth hubs and community buildings, outreach/mobile units and outdoor spaces providing different ways for young people to get involved. The current and future focus for youth services is on the following projects, enabling it to reach as many young people as possible: - expanding and enhancing Youth Hubs to offer more specialist help and advice and provide access to more young people

Policy/Paragraph	Commentary
	- expanding Mobile and Outreach service provision to increase remote access to youth services and targeted help for more complex issues. - temporary outreach provision in high streets and other public spaces in high-need areas to increase access during peak times of the year - enhancing links with local district contextual safeguarding meeting to provide targeted resources to identified areas to meet local needs of Young People. - connectivity within Government Family Hub agenda to ensure the whole family approach is maximised across Kent KCC would welcome the Borough Council's continued support for youth services via planning obligations *Broadband* Broadband is a pre-requisite for all communities, and is especially essential to enable social mobility and commercial productivity especially as flexible hybrid working continues for a proportion of the workforce. Without exception, within planning decisions in the Borough, KCC has been unsuccessful in its requests for planning conditions for Superfast Broadband installation to be considered in planning decisions. KCC understands that the Borough Council does not currently have a broadband / digital connectivity policy to enable the installation of superfast broadband fibre into new developments. It is essential this is rectified. There is very limited consideration of digital connectivity within the Regulation 18 consultation document and the County Council would welcome engagement in respect of this to develop an appropriate digital connectivity to support resilient and connected communities in the Borough. <u>PRoW</u> The County Council would welcome consideration of the PRoW network as an infrastructure provision which can provide wider ranging benefits for the community and would also welcome reference to the aims of the ROWIP within this section. The Medway Towpath provides great offroad connectivity between the Borough and wider area, and as such is receiving investment from various funding opportunities as they arise. The County Council would like to highlight the importance of any future development opportunity which could contribute further to this investment through development contributions. <u>Sports and Recreation</u> The County Council would welcome further consideration of opportunities for communities to engage in physical activity and would encourage the Borough Council to engage with Active Kent[1] to support the creation of such opportunities for the benefit of new and existing communities. Active Kent is able to provide support and advice to the development of new initiatives relating to sport and recreation. The County Council is keen to ensure the Borough Council Local Plan makes adequate provision for sport and recreation and gives consideration as to how activity and recreation facilities, and green and blue spaces are accessed, and provide opportunities that make active travel an easy option. The County Council would also recommend consideration of the following guidance available from Sport England to inform strategies around tackling inactivity, supporting / encouraging under-represented groups to be active and ensure healthy and resilient communities thrive the in the Borough: • https://www.sportengland.org/facilities-planning/active-design/ • https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/ • https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/ • https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/

[1] www.activekent.org

Policy/Paragraph	Commentary
	• https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/facilities-planning-model/ • https://www.sportengland.org/facilities-planning/active-design/ *Specific requests for section 5.7:* • *The continued support for the delivery necessary infrastructure using Section 106 agreements for Education, Community Learning, Libraries, Youth Services, Adult Social Care, Waste and Broadband infrastructure.* • *Prioritisation of education infrastructure within list of funding requirements for via section 106 agreements,* • *Engagement between Borough and County Council to ensure sites are identified to meet educational needs.* • *Recognition in the Local Plan that all developments which generate pupil place pressure must be required to contribute towards the mitigation of both education build and land costs where these arise.* • *Engagement between Borough and County Council to ensure adequate early years provision is provided to support growth.* • *Continued support for the provision of Adult Social Care services in the Borough through the Local Plan.* • *Continued support for libraries within section 106 agreements through the Local Plan.* • *Consideration of policy support for the delivery of Community Learning and skills programmes to support existing and new communities in the Borough.* • *Consistent Local Plan policy support for planning obligations where there is an identified need for county waste infrastructure to support development.* • *Continued support for the provision of youth services in the Borough through the Local Plan.* • *Engagement between Borough and County Council regarding the development of policies relating to digital connectivity.* • *Acknowledgement of the wide ranging benefits offered by the PRoW network and necessary Local Plan policy support.* • *Engagement between the Borough Council and Active Kent.* • *Appropriate provision in Local Plan policy for sport and recreational infrastructure.* • *Consideration of Sport England guidance (links provided).*
5.9 Natural environment – what are the issues?	PROW The County Council would welcome consideration of the PRoW network and the aims of the ROWIP within this section. Sustainable Urban Drainage Systems (SuDS) The County Council, as Lead Local Flood Authority notes that the section does not appear to consider the water environment. The County Council strongly recommends that the Borough Council consider the inclusion of surface water and waterways within the Local Plan, defining the priorities and strategies which should be implemented within new development as well as the opportunities provided within the water environment. KCC does recognise that that flood risk and sustainable drainage systems are mentioned within 5.12 Climate Change, however, it may be easier certainly for the delivery of surface systems which are integrated within green space to be addressed within this Natural Environment section as it pertains to the preference in approach to surface water management. Biodiversity The County Council would recommend that the Borough Council considers seeking more than 10% biodiversity net gain where viable – with sites potentially specifically allocated for biodiversity net gain within the Local Plan. Local Plan policy should support the delivery of net gain onsite as a preference, with offsite solutions only where it is not possible to deliver onsite. The County Council agrees with the justification for a requirement for tree canopy coverage on new development and the references to flooding and microclimate regulation. Indeed, 'ecosystem services', or 'natural capital', is referenced within the NPPF (paragraph 174) so there is justification in developing a tree canopy plan for this reason, as well as to create 'green corridors' and strengthen ecological resilience. The County Council would question how a minimum requirement for tree canopy coverage could be practically applied to new development.

Policy/Paragraph	Commentary
	The County Council agrees that new developments should integrate into the fabric of buildings habitat space for wildlife as these are in-situ for much longer compared to externally mounted bird boxes and have a higher chance of utilisation. The County Council recommends reference to Kent's Plan Bee, a pollinator action plan developed by the County Council that seeks to improve the food sources and general habitat for pollinators. *Specific requests for section 5.9:* • *Representation of the PRoW network and the ROWIP in respect of the natural environment.* • *Reference to the water environment including surface water and waterways in respect of the natural environment. This should the priorities and strategies which should be implemented within new development as well as the opportunities provided within the water environment.* • *Assessment of policy for securing above 10% biodiversity net gain, where viable.* • *Assessment of the practicality and deliverability of a tree canopy requirement.* • *Reference made in the Local Plan to Kent's Plan Bee.*
5.10 – Built and Historic Environment – what are the issues?	Heritage Conservation The County Council welcomes the commitment within paragraph 5.10.19 to the development of a heritage strategy. This will be an essential resource for helping the Borough Council identify ways that the Borough's historic environment can enhance life in the Borough. The County Council would recommend that the Strategy includes the following goals: • To identify and describe the key themes of relevance of the heritage of the Borough and the heritage assets that represent them • To assess the role that these can play in regeneration, tourism and life in the Borough • To identify both their vulnerabilities and the opportunities they provide • To inform site allocations within the Borough • To support policy development The County Council, in respect heritage conservation, recommends the Local Plan considers the following: *Development* A key issue is the need to take account of any existing historic character of proposed development sites. This is crucial to ensuring high quality developments are properly integrated into the existing towns and villages. The Local Plan should require that such schemes be sympathetic to any existing structures and in character with other buildings. Development should be in keeping with the scale of the surroundings and in character with any existing traditional and historic buildings on the site. KCC would also recommend materials used in the design are appropriate to the existing character, if possible, by using locally sourced and traditional materials. *Non-designated heritage assets* At present, KCC considers the text focuses rather heavily on designated heritage assets. However, the vast majority of heritage assets in the Borough are non-designated. These nonetheless play a critical role in the character of the Borough as they are known to local people and have been part of their communities for generations. They provide opportunities to connect new growth and development with existing settlement and thus integrate new residents with the existing community. To ensure these assets are not sacrificed to development, the Local Plan should ensure that it includes a policy on non-designated assets so that decision-making is supported effectively. *Climate Change* The historic environment has a significant role to play in the conservation of resources required for development, and also in energy efficiency. Old buildings can sometimes be more energy efficient than newer ones and of course have already been built. Thus, it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one. Historic

Policy/Paragraph	Commentary
	England has produced a range of guidance on climate change and the historic environment that reviews the threats to the historic environment posed by climate change (Climate Change: Mitigation, Adaptation and Energy Measures | Historic England). The guidance also demonstrates that historic structures, settlements and landscapes can sometimes in fact be more resilient in the face of climate change, and more energy efficient than more modern structures and settlements. *Historic Landscape* An aspect of Tonbridge and Malling Borough's heritage that should be a strength for the Borough is its historic landscape. The landscape that is visible today is the result of many centuries of evolution and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character is firmly rooted in the past. The Kent Historic Landscape Characterisation (2001) is a tool for understanding this historic context and should be used to inform decisions taken regarding the landscape character of the Borough. Ideally, however, this county level study should be both updated and deepened to be more relevant at the Borough and local level, as has happened recently in Tunbridge Wells and on the Hoo Peninsula. This will allow more effective decision-taking and assist the application of key landscape principles on a case-by-case basis. KCC would also encourage the Borough Council to ensure that the historic aspects of landscape character are fully integrated into considerations of more general character which often neglect the role that the past has played in establishing the modern character and the extent to which historic features survive and need consideration in development control and agricultural practice. *SUDS schemes* Sustainable Drainage Schemes (SuDS) may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations. When SuDS are planned it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. KCC has recently produced guidance for SUDS and the historic environment which provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets. *Rural development* It should be noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. Historic England, KCC and Kent Downs AONB Unit have published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character. The Kent Farmsteads Guidance has been endorsed by the County Council and it is recommended that the Borough Council considers adopting the guidance as Supplementary Planning Document (SPD) as part of the Local Plan process. The County Council would welcome further discussion with the Borough Council on this point. *Open Space sites* Open spaces have an important role to play in conserving and promoting the heritage of the Borough. Some of the open spaces are heritage assets in their own right representing urban spaces that have been designed as public amenities or that reflect the wealth and aesthetic tastes of private individuals. Other open spaces may not be assets in their own right but they may contain heritage assets, for example in the form of historic structures or buried archaeological sites. Others again can be important in that they allow heritage assets to be displayed, for example where a listed building is located next to an open space. As such, any alterations to open spaces need to be considered for the impact that they may have on the historic environment of the Borough. Over the last few years the County Council has been working with volunteers from the Kent Gardens Trust to review the gardens and open spaces of other Districts/Boroughs in order to better understand the history and development of the gardens and their surviving remains. These reviews are accompanied by Statements of Significance for each garden that allows the Local Planning Authority to use them effectively in the development control process. The information also makes it easy for the Local Planning Authority to include the gardens on a list of local heritage assets (a 'Local List') as the reports generated are to the same standard as those used for Registered Parks and Gardens. The County Council would be happy to discuss a similar project for the Borough.

Policy/Paragraph	Commentary
	Archaeology The Local Plan should contain a policy specifically on archaeology that commits the Council to promoting the enjoyment of the Borough's archaeological resource through the protection and enhancement of archaeological sites, monuments and historic landscape features, and seeks to encourage and develop their educational, recreational and tourism potential through research, public access, management and interpretation. Where possible, developers should seek to use the Borough's archaeological assets to shape their development proposals, provide interest and character and protect the assets. The framework for the management and enjoyment of the archaeological heritage should be the Tonbridge and Malling Heritage Strategy. Development proposals affecting heritage assets with an archaeological interest should be accompanied by a desk-based assessment and, if appropriate, by archaeological fieldwork, that: • Characterises the nature, extent and condition of the archaeologic al deposits in the development area • Assesses the significance of the deposits and the contribution made by their setting • Describes and assesses the impact of the development proposals on the archaeological deposits, their significance, and their setting • Describes how the archaeological deposits will be protected during development. Where this is not possible the assessment should clearly justify why this is not possible and should describe the proposals for mitigating any impacts Development proposals leading to substantial harm to the archaeological interest of designated heritage assets such as Scheduled Monuments, Registered Parks and Gardens, Protected Military Remains or heritage assets of comparable significance should normally be refused. Where development proposals affect non-designated heritage assets with an archaeological interest, it is expected that the archaeological remains will be preserved in-situ. Where this is not possible, clear justification will be required. Where the justification is accepted, a programme of archaeological excavation and recording is likely to be required. The fieldwork will be appropriate to the significance of the archaeological deposits and must be carried out by an appropriately qualified contractor following a written specification agreed by the Borough Council. The programme will include all phases of desk-based and fieldwork, post-excavation analysis, publication of the results and deposition of the site archive in an appropriate repository. The County Council has provided an example for archaeology and would welcome engagement with the Borough Council regarding the potential content of a Borough Council policy.

Policy/Paragraph	Commentary
	"The Council will promote the enjoyment of Tonbridge & Malling Borough's archaeological resource through the protection and enhancement of archaeological sites, monuments and historic landscape features, and will seek to encourage and develop their educational, recreational and tourist potential through research, public access, management and interpretation. *Where possible developers should seek to use the Borough's archaeological assets to shape their development proposals, provide interest and character and protect the assets.* *The framework for the management and enjoyment of Tonbridge & Malling's archaeological heritage will be the Tonbridge & Malling Heritage Strategy (to be adopted in xxxx).* *Development proposals affecting heritage assets with an archaeological interest must be accompanied by a desk-based assessment, and if necessary by archaeological fieldwork, that :* • *Characterises the nature, extent and condition of the archaeological deposits in the development area* • *Assesses the significance of the deposits and the contribution made by their setting* • *Describes and assesses the impact of the development proposals on the archaeological deposits, their significance, and their setting* • *Describes how the archaeological deposits will be protected during development. Where this is not possible the assessment should clearly justify why this is not possible and should describe the proposals for mitigating any impacts* *Development proposals leading to substantial harm to the archaeological interest of designated heritage assets such as Scheduled Monuments, Registered Parks and Gardens, Protected Military Remains or heritage assets of comparable significance will normally be refused.* *Where development proposals affect non-designated heritage assets with an archaeological interest, the Borough Council would expect the archaeological deposits to be preserved in-situ. Where this is not possible clear justification will be required. Where the justification is accepted a programme of archaeological recording may be required to be carried out. The fieldwork will be appropriate to the significance of the archaeological deposits and must be carried out by an appropriately qualified contractor following a written specification agreed by the Borough Council. The programme will include all phases of desk-based and fieldwork, post-excavation analysis, publication of the results and deposition of the site archive in an appropriate repository."* *List of Local Heritage Assets* Local Lists are intended to help the Local Planning Authority give special regard to assets of local character in their development control decision-making. These can include buildings, open spaces and archaeological sites. The County Council would suggest that a commitment to developing a Local List of Heritage Assets should be included in the Local Plan. *Well-being and the historic environment* Over the last couple of decades, there has been a growing body of evidence that is demonstrating how access to and participation in the arts and cultural activities can dramatically improve health and increase wellbeing. 'Heritage Counts 2017', produced by Historic England, contained the following conclusions: • 93% of residents say that local heritage has an impact on their quality of life. • Heritage supports social cohesion and inclusion – people can develop much stronger, long-lasting connections with their communities through heritage conservation work. • 80% of people think local heritage makes their area a better place to live. Heritage-led activities are contributing to improved public health in many ways such as reducing social exclusion, reducing health inequalities within society, increasing opportunities for community engagement and increasing physical activity to combat conditions such as obesity and diabetes. However, whilst there is a growing evidence base there is still no clearly established assessment and evaluation framework for heritage in health and so much of the evidence is still unavailable to health professionals and those with commissioning responsibilities. The potential of heritage in public health is underestimated and more needs to be done to properly measure and evaluate the health outcomes from these activities in order to build a robust evidence base and make use of heritage as an effective and financially valuable health resource. The County Council would be happy to discuss further the ways that the Borough's heritage

Policy/Paragraph	Commentary
	can contribute to health and well-being in the Borough and how that can be incorporated into planning policies moving forward. *Green infrastructure* If properly designed, green infrastructure has the potential to help new development be better integrated into the existing rural and urban landscape by ensuring that it fits into the grain of what is already there. The pattern of roads, tracks and lanes in Tonbridge and Malling has been used for centuries to link the Borough's towns, villages, hamlets and countryside. By taking advantage of these existing and historic routeways people will be able to move through the Borough while retaining the historic geography of the region, but also following routes more likely to be accompanied by historic hedgerows and planting. This has the potential to unite heritage and ecology to help people access and enjoy green infrastructure features more easily and naturally. Using historic routeways also allows green infrastructure designers to incorporate heritage assets to provide features of interest. In turn this will help people accessing the green infrastructure to become more aware of and value the Borough's heritage, which will in turn assist their conservation and re-use. Many of the green and blue corridors are themselves historic routes and contain nationally and locally important heritage assets. For example, during the Second World War, the River Medway was the GHQ Stop-Line and still contains dozens of pillboxes and defence sites. These constitute a nationally important group of heritage assets. They may not be protected in law as protecting complexes such as this is particularly difficult and scheduling is seen as a management decision, but the County Council would encourage that they be respected and protected as though they were statutorily protected sites and should be considered accordingly within the Local Plan. *Specific requests for section 5.10:* • *The Borough Council to work with the Council to develop a Heritage Strategy which includes the goals identified in this response.* • *Consideration of the existing historic character of proposed development sites and a potential requirement within the Local Plan for schemes be sympathetic to any existing structures and be designed in character with other buildings as may be appropriate.* • *Consideration recommendation within the Local Plan that where applicable, that materials used in the design of new developments use locally sourced and traditional materials.* • *Inclusion of a Local Plan policy regarding non-designated assets so that decision-making is supported effectively.* • *Consideration of guidance around threats to the historic environment posed by climate change (Climate Change: Mitigation, Adaptation and Energy Measures | Historic England).* • *The Kent Historic Landscape Characterisation (2001) is a should be both updated and deepened through the Local Plan process to be more relevant at the Borough and local level,* • *Borough Council to ensure that the historic aspects of landscape character are fully integrated into considerations of the more general character of an area.* • *Consideration of the direct and indirect impacts of SuDS on the historic environment and reference guidance on the topic accordingly within the Local Plan.* • *Adoption of the Kent Farmsteads Guidance as an Supplementary Planning Document (SPD).* • *Borough Council to engage with County Council in respect of a Local List of heritage assets to include gardens, generating reports similar to the standard as those used for Registered Parks and Gardens.* • *Borough Council to engage with County Council in respect of a specific Local Plan policy regarding archaeology.* • *Commitment to the development of a Local List of Heritage Assets should be included in the Local Plan.* • *Borough Council to engage with County Council regarding policy support regarding how the Borough's heritage can contribute to health and well-being in the Borough.* • *Consideration of historic routeways and the County Council would encourage that these assets are protected and respected through Local Plan policy.*
5.12 Climate Change – what are the issues?	Kent and Medway Energy and Low Emissions Strategy seeks to ensure that the decisions and plans embrace clean growth and allow the development of a clean, affordable and secure energy future – the County Council would recommend consideration of this strategy and the County Council's Environment Strategy during the development of the Local Plan for the Borough, SuDS The County Council, as Lead Local Flood Authority, is pleased to note that the document actively encourages the "potential multi-functional role of green infrastructure". In respect of

Policy/Paragraph	Commentary
	references to flooding and sustainable drainage, the Borough Council should specifically refer to the Lead Local Flood Authority policy and also the Non-Statutory Technical Standards as laid out by DEFRA[2] given that these reflect those desired outcomes also and that they underpin the design of SuDS systems: The County Council is also pleased to note (and would actively encourage) that the Borough Council "will work with statutory consultees such as the Environment Agency and Kent County Council as the Local Lead Flood Authority to ensure all sources of flooding are taken into account as well as the appropriate future climate change adaptations." The County Council notes that paragraph 5.12.16 references the sequential test and this being applied to the borough to inform the spatial strategy. It is important that this considers all forms of flooding, especially given the recent precedents of planning being refused due to the sequential test not being passed due to surface and ground water flooding issues elsewhere in the country. *Specific requests for section 5.12:* • *Consideration of the Kent and Medway Energy and Low Emissions Strategy and Kent County Council's Environment Strategy* • *Local Plan to consider all forms of flooding, including surface and ground water flooding.*
6. Other Matters	
6.1. How should development be managed?	PRoW Local requirement priorities play a significant role as development comes forward, and greatly assist in understanding the needs of the communities. The County Council considers that existing PRoW must be protected in the event of any development, but development should also present opportunities to enhance the existing PRoW network and boost connectivity for communities – giving Active Travel options for all NMUs. *Specific requests for section 6.1:* • *Necessary protection should be offered through the Local Plan for existing PRoW, but also opportunities explored to deliver network improvements to boost connectivity.*
Appendix B	
	At this stage of the Local Plan process, the County Council has not provided commentary on all of the individual sites listed within this Appendix. The County Council would strongly encourage the Borough Council to engage with the County Council regard the assessment of the proposed development sites and growth strategy to better understand the infrastructure mitigation measures which may be required to support growth in the Borough. PRoW The County Council requests that as part of the site assessments and the preparation of the Draft Local Plan, the Borough Council has consideration of the following: - Enhancements to and positive incorporation of the existing PRoW network must be considered for each site, in preparation for the expected increase in use of the existing paths as a result of the proposed developments. - Local Plan policy should aim to protect and enhance the quality of PRoW contained within (or linking to) development sites. The inclusion of a PRoW reference will help support other policies within this document and send a clear message to developers that PRoW are a material consideration at the start of the planning process. - That the PRoW network is considered at an early stage of the design process and successfully incorporated into future developments. - The current ROWIP should be referenced as it is a statutory policy document for PRoW. It is crucial that this is referred to, as it is a strategic and statutory policy document for the protection and enhancement of PRoW. - The emerging Kent Design Guide - Financial contribution - new development provides opportunities to secure investment in the PRoW network, which could enhance opportunities for active travel and outdoor recreation across the Borough. Developer contributions are used to upgrade existing routes or create new path links that address existing network fragmentation and issues highlighted by the

[2] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf

Policy/Paragraph	Commentary
	public. Inclusion should therefore be given to the investment of planning obligation contributions and s106 funding into the PRoW network. - Rail crossings – where PRoW from a new development into central amenities cross a rail line, due consideration has to be given to increase of use and the impact on crossing safety. Many PRoW currently cross “at grade” crossings, which are not deemed appropriate for higher level of use. - Enhanced connectivity for walking, cycling and equestrian activity across the borough, with a range of sustainable transport options available for the public and opportunities to access high quality open space. While the existing PRoW resource provides extensive opportunities for active travel and outdoor recreation, there are gaps in the network and accessibility issues that need to be addressed. Future growth and development should help to address these issues and enhance the PRoW network, so that the benefits of this access resource can be maximised by residents and visitors. - There should be a requirement for applicants to record the route of any PRoW affected by development, clarifying intentions for accommodating, diverting or enhancing paths. Any policy should clearly state that planning applications that would adversely affect the existing PRoW network will not be permitted.
Interim Sustainability Appraisal Report	
	<u>PRoW</u> The County Council welcomes the inclusion of the PRoW network within 1.42 Material Assets but would emphasise that the increase in population leads to inherent demands on the network. The existing PRoW network, particularly when improved and enlarged, could make a significant contribution to realise the Plan's aims for the future community and the prominence of walking and cycling should place this to the fore in future development plans. The Objectives proposed within this Interim Sustainability Appraisal Report all connect and overlap with the aims of the ROWIP, particularly: SA Obj 1 / SA Obj 2 / SA Obj 4 / SA Obj 5 / SA Obj 6 / SA Obj 10 And the following from the Proposed SA Monitoring Framework: SA Obj 1 / SA Obj 2 / SA Obj 4 / SA Obj 6 / SA Obj 10 / SA Obj 12 <u>Waste Management</u> The County Council, as Waste Disposal Authority, notes that paragraph C.63 in Appendix C Baseline Information needs to be updated to reflect the newly opened Allington HWRC within the Borough. Indicators and Targets for SA Objective 13 needs to recognise that these will only be met if sufficient infrastructure is provided. The County Council’s commentary in respect of waste infrastructure and spatial distribution notes the current and future pressure on Waste Transfer Station infrastructure. Much emphasis is put on reduction of waste to landfill but Kent already sends less than 2%. Focus needs to be on providing infrastructure to facilitate increased recycling.

Growth and Communities

Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Phone: 03000 415673
Ask for: Francesca Potter
Email: francesca.potter@kent.gov.uk

Gill Gray PSLCC
Town Clerk & Responsible Financial Officer
Westgate-on-Sea Town Council
78 St Mildreds Road
Westgate-on-Sea
Kent CT8 8RF

BY EMAIL ONLY

30 November 2021

Dear Gill,

Re: Westgate-on-Sea Neighbourhood Plan (2021-2031) Pre-Submission September 2021 - Regulation 14 Consultation

Thank you for consulting Kent County Council (KCC) on the Westgate-on-Sea Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the document.

Westgate-on-Sea Neighbourhood Plan (2021-2031) Pre-Submission September 2021

Section 1 - Introduction

Highways and Transportation: The County Council, as Local Highway Authority, is disappointed that the Neighbourhood Plan appears not to address several key areas in respect of highways and transportation. The Neighbourhood Plan should provide more focus on how people access Westgate, and its services and facilities. It should consider improvements to encourage walking, cycling and use of public transport and these should be outlined within a 'Movement and Connectivity' chapter, with associated policies supporting delivery.

The County Council is also concerned that the Neighbourhood Plan advocates the diversion of section 106 funding away from much needed road infrastructure that will serve Westgate-on-Sea and the wider district, towards schemes and projects that will not assist in managing the traffic impact that is expected from planned development.

The County Council considers that this section would benefit from being more positively worded. It currently focuses on the development already allocated in the Thanet Local Plan and the fact that the Town Council was opposed to the Plan, rather than positively summarising the challenges that will need to be faced moving forward.

Section 3 - The Neighbourhood Development Area

Figures 3.1 Neighbourhood Plan Area

Public Rights of Way (PRoW): The County Council requests that the map is revised to include the routes of the PRoW in the marked area - Public Bridleway TM28 and Public Footpaths TM26, TM27 and TM42. An extract of the Definitive Map should be held by the Town Council; if not, KCC is able to provide upon request.

Section 7 - About Westgate on Sea

PRoW: The PRoW network assets should be referenced within this section, with detail as to how the current PRoW network supports local transport choices. The text should also clarify that the KCC has a statutory duty to ensure the network is recorded, protected and maintained in partnership with the Town Council. The newly legislated National Trail - the England Coast Path - should also be referenced as it brings significant tourism opportunities to the area and should be incorporated in any planning or improvements along the coastal route.

Public Health: The County Council would recommend that consideration around the health and wellbeing of residents should be made throughout the Neighbourhood Plan. It is important to understand the health needs of the current and future population and the opportunities which the Neighbourhood Plan could provide to improve health and wellbeing for residents. Evidence should be used from the Kent Joint Strategic Needs Assessment (JSNA) and other sources of public health data from the Public Health Outcomes Framework (PHOF) - including ward level data - in addition to referencing how these policies support the Kent Health and Wellbeing Strategy.

Consideration in the Neighbourhood Plan to the health and wellbeing of local residents would support guidance within the National Planning Policy Framework (NPPF) (Section 8), that recommends planning policies should aim to support healthy, inclusive and safe places which enable and promote healthy lifestyles. This is especially prevalent where this would address identified local health and well-being needs. For example, through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

Westgate-on-Sea performs significantly worse on a number of health indicators than the England, Kent and Thanet averages. These indicators include 'Life Expectancy' and the percentage of 'people who report having a limiting long-term illness or disability'. There are also a number of borough level indicators that Thanet overall performs significantly worse than both Kent and England. It is important this data is recognised and that there are policies

within the Neighbourhood Plan that seek to support and improve the health needs of the current and future population.

The County Council notes that on page 12, the Neighbourhood Plan states that Westgate is fairly affluent – however, KCC is not clear how this is justified as levels of deprivation are actually above the England and Kent averages. In addition, Westgate-on-Sea performs significantly worse than England and Kent averages on income deprivation, older people in poverty, and unemployment. It is important that data and evidence is used to accurately reflect and justify policies and objectives to improve the health and wellbeing of residents in Westgate-on-Sea.

Section 8 - Our vision and objectives for Westgate-on-Sea

Highways and Transportation: The County Council notes that this section of the Neighbourhood Plan outlines the vision and objectives for Westgate-on-Sea which includes a key aim of protecting the environment. Highway and transportation measures and policies can play a key part in meeting these objectives, as well as making the area more sustainable. This is not strongly reflected within the objectives which makes little or no reference to the need for development to consider active travel.

The County Council considers that Objective 6 could potentially be expanded to include reference to sustainable travel measures within the town (including active travel). There is limited reference to the Thanet Transport Strategy (TTS) throughout the document which provides a strategic backbone for transport interventions within the district. This Neighbourhood Plan should complement the TTS with specific, locally focussed transport policies/community projects. It is noted that highway accessibility is addressed (in part) within the guidelines included within section 10, however, these matters are potentially better suited to being included within an additional chapter that seeks to address movement and connectivity specifically.

Section 9 -Schedule of planning policies

Highways and Transportation: There are no specific highway or transport based policies included within this Neighbourhood Plan. The County Council, as Local Highway Authority, considers that this represents a missed opportunity to highlight movement and connectivity issues such as improved access to the railway station and highway safety/amenity. Further consideration is recommended to the inclusion of a specific policy section for movement and connectivity that could encompass highway and transport related matters.

Section 10 - Design

WSNP1 – Protection of seafront character

Provision of County Council Community Infrastructure and Services: It is recommended that consideration is given to the fact that any increase in households requires a proportionate increase in sustainable infrastructure provision, commensurate with the profile of the occupants.

Policy WSNP2 – Design Guidelines

Provision of County Council Community Infrastructure and Services: The County Council is supportive of the objective of promoting quality design in the built environment - including design that improve energy efficiency and renewable energy. KCC is in the process of developing the Kent Design Guide (to which a current consultation is being undertaken) in order to promote the principles of quality design in new development and reference to this document is recommended.

Policy WSNP3 – Safeguarding Leisure & Tourism facilities / Policy WSNP Protection of shopping areas / Policy WSNP5 Retention of employment space

Provision of County Council Community Infrastructure and Services: Consideration should be given to the fact that any increase in households requires a proportionate increase in sustainable infrastructure provision, commensurate with the profile of the occupants.

PRoW Public Rights of Way (PRoW): The County Council recommends that reference is made to the County Council's ROWIP (Rights of Way Improvement Plan) to better enable partnership working to continue and deliver improvements to the PRoW network in Westgate. The Neighbourhood Plan should consider the need for accessible tourism, leisure, shopping and employment facilities - for residents and visitors to the area. The PRoW network and the ROWIP has a critical role in this, and as such there should be specific mention to the need to support improvements to walking and cycling routes where they can assist the County Council's objectives within the ROWIP.

Section 12 – Heritage

Heritage Conservation: The County Council will engage directly with the Neighbourhood Plan Steering Group to discuss the heritage conservation content of this Neighbourhood Plan.

Section 13 - Sustainability

Policy WSNP9 – Low Carbon Development

Provision of County Council Community Infrastructure and Services: The County Council is supportive of the aspiration to ensure that new developments pursue sustainable building practices.

PRoW: Reference should be made to the opportunities offered through the PRoW network for sustainable transport and connectivity. County Council policy seeks to improve and upgrade the PRoW network where it links with amenities, public transport nodes, work and education to increase the attractiveness of Active Travel and support modal shift – this should be reflected within the Neighbourhood Plan.

Policy WSNP11 –Designation of Local Green Spaces (LGS)

Public Rights of Way (PRoW): The County Council is supportive of this policy.

Section 14 -Green and open spaces

Section 14.2

PRoW: The provision of high quality open green spaces and opportunities for outdoor recreation should be a priority within the Neighbourhood Plan. It should aim to increase the provision of accessible green spaces and improve opportunities to access this resource. Good public transport and active travel links with open spaces should be made available so that the public are not dependent on private vehicle use for visiting these sites.

Section 14.3

PRoW: The County Council recommends that Public Bridleway TM28 and the relevant Public Footpaths should be referenced specifically. KCC recommends that reference is also made to the ROWIP which aims to aid decision-making and promote good design in PRoW and countryside access management.

Policy WSNP13 Westgate Countryside Triangle

Highways and Transportation: Whilst the intentions of this policy are understood, it is important to highlight that the Shottendane Road corridor is currently earmarked for improvement within the TTS and Local Plan Infrastructure Delivery Plan (IDP). As these highway improvements may require some of this land to be delivered in the most appropriate way, this policy should facilitate a level of flexibility to enable road widening and footway/cycleway infrastructure to be delivered without a policy conflict.

PRoW: Specific reference should also be made to the PRoW within the site (TM28).

Policy WSNP14 Building on the best and most versatile agricultural

Highways and Transportation: The County Council draws attention to its comments in respect of Policy WSNP13 which are also applicable to this policy.

Section 16 - Facilities

16.2 Infrastructure of Westgate-on-Sea / Policy WSNP17 – Safeguarding community facilities

Provision of County Council Community Infrastructure and Services: The County Council is supportive of the objective of safeguarding existing community facilities provided that they currently (or could in the future), meet the evolving needs of the Westgate community and provide appropriate space for relevant and evolving needs. However, the safeguarding of community facilities should not be limited only to the preservation of buildings. Other forms of community facilities such as resources for outreach youth work, or social care to support the elderly to live independently, should also be considered valuable.

Highways and Transportation: The County Council, as Local Highway Authority, would refute the suggestion within this section that the Transport Plan (which it assumes to be a

reference to the TTS) was not written in conjunction with planned housing. The TTS was developed over several years (in conjunction with the Local Planning Authority) within the context of the Local Plan process, where several changes were made to draft land allocations. Substantial housing allocations were identified within Westgate and Birchington at an early stage of the process which were increased in size as the Plan progressed, and these increases were considered as the TTS evolved at each stage.

The principles of the TTS, and specifically the Inner Circuit Route Improvement Strategy (ICRIS), were communicated to elected council members throughout the plan making process. The draft TTS document was included within the Regulation 19 consultation undertaken by the Local Planning Authority which local stakeholders had an opportunity to comment on. The Draft TTS was also referred to at the Local Joint Transportation Board, where it received a very positive response. It is relevant to point out that recently, KCC, as the Local Highway Authority, has gratefully received support from the Town Council for the ongoing bid to the Department for Transport for grant funding towards the delivery of sections of the ICRIS. Therefore, KCC would encourage the Town Council to reconsider the text in this section of the Plan.

The provisions within policy WSNP18 are already encompassed within the NPPF and do not need to be replicated within this Plan.

Policy WSNP18 – Provision of Infrastructure

Provision of County Council Community Infrastructure and Services: The County Council is supportive of the objectives of this policy and strongly agrees that any new development should provide mitigation for its impact on existing services.

Infrastructure to support proposed new development in Westgate will need to be considered above and beyond those specifically named in Section 16.2 (i.e. road improvements, the provision of doctors and dentists and sewerage capacity).

Other county services that will require infrastructure contributions/provision are:

- Primary education, as well as early years nursery provision – through the provision of a new on-site 2FE primary school and nursery
- Special Educational Needs (SEN) provision – through planned expansion at specific schools (Garlinge Primary, Hartsdown Secondary and East Kent Junior College)
- Secondary education – through the delivery of the new Park Crescent Secondary School
- Social care – five key priority areas (see comments below on WSNP21)
- Adult education – through the improvement of existing facilities at Hawley Square and by extending adult education classes into the community
- Youth services – through targeted outreach services according to need
- Libraries – improvements at Westgate Library (see further detail in WSNP20 below)
- Waste processing – through the Margate Household Waste Recycling Centre (HWRC) expansion project
- High speed broadband for all new dwellings

PRoW: The County Council recommends that this policy should include walking and cycling connectivity across the Parish, giving priority to Active Travel routes as appropriate.

16.3. Contributions from Community Infrastructure Levy

Policy WSNP19 –Community Infrastructure Levy

Provision of County Council Community Infrastructure and Services: The County Council raises a query as to the inclusion of this policy and its wording given that Thanet District Council has not adopted the levy. If CIL was to be adopted by Thanet District Council, KCC will require allocations from funds received to mitigate impacts upon its services locally from new development to avoid any reduction/dilution of services to existing residents.

16.4 Section 106 monies

Highways and Transportation: The supporting text in paragraph 16.4 appears to raise concerns over the delivery mechanism for the new road system (ICRIS), but then suggests that the contributions towards highway infrastructure should instead be diverted to projects identified within Appendix 1. The projects set out in Appendix 1 do not provide an alternative strategy to manage the traffic impacts of development. Therefore, this approach is not supported by the Local Highway Authority. The evidence provided by the Local Highway Authority and Local Planning Authority at the Thanet Local Plan examination provides an overview of infrastructure apportionment which developments are expected to broadly comply with. In tandem with this funding stream, KCC is exploring potential external funding streams with an aim to provide ICRIS infrastructure as soon as possible. Whilst the timing of infrastructure is still subject to more detailed discussions and appraisal, KCC, as the Local Highway Authority, remains committed to pursuing funding for the delivery of the ICRIS and this should be reflected within the text.

PRoW: The County Council would recommend that specific mention is made to the need to improve and enhance the PRoW network to enable safe and attractive walking and cycling connections and links from new developments to community facilities. An increased population will undoubtedly add to the pressure and importance of the surrounding PRoW network. It is critical therefore that some general wording is included within this section to secure funding to ensure these highly regarded links are not degraded. Developer contributions could be used to upgrade existing routes or create new path links that address existing network fragmentation issues.

Policy WSNP20 – Section 106

Provision of County Council Community Infrastructure and Services: The County Council is supportive of the allocation of section 106 monies in mitigating the impact of the development across all relevant county services (as listed above), including highways.

KCC supports the allocation of section 106 monies to local services and facilities such as those listed in Appendix 1 if these facilities can meet the evolving needs of the local community and are the most effective way of delivering services.

Westgate Library does not currently meet inclusivity standards and KCC supports the allocation of section 106 library monies to this project. KCC proposes that a new lift is installed to allow the building to be used to its full capacity and additional monies may be used to further enhance local library services and resources such as through the provision of bookstock and/or digital library resources.

KCC would not support the ring-fencing of all section 106 community services contributions, for a single community centre. Whilst the Lymington Road Community Centre listed in Appendix 1 may be very close to a development site, it would not be appropriate to limit the monies to one building. The Lymington centre may also not be the most appropriate support for the community requirement(s) at the time of need.

As referenced in section 16.4, the upgrading of existing buildings and the provision of new physical infrastructure (such as a sports centre or skate park) is one way, but not the only way, to deliver facilities or resources for young people. The needs of young people and the support they require is continuing to evolve in a post-Covid-19 society. Youth outreach work to address more complex needs such as substance abuse or mental health crises cannot be addressed without the adequate resourcing of services delivered under Early Help and Preventative Services (EHP).

Section 17 - New Developments

PRoW: Specific mention should be made to improving and enhancing the PRoW network, both within, and connecting to, the area between Westgate and Garlinge, as identified by the red dot line. This is to enable safe and attractive walking and cycling connections and links from new developments to community facilities.

Reference is also recommended to the presence of Public Bridleway TM28 and Footpaths TM26, 27 and 42, and the connection to Footpath TM23 from TM28.

WSNP21 Policy Statement – the houses allocation on the agricultural land in Westgate and Garlinge

Provision of County Council Community Infrastructure and Services: The County Council sets out it's comments below:

Strict 30% affordable housing quota - KCC supports new developments of mixed dwelling types and homes to meet a range of needs in the community. The affordable housing requirement of 30% must be balanced against required development contributions to support local infrastructure to ensure sustainable and viable growth.

Support for semi-assisted and assisted accommodation for the elderly – KCC supports the principle of enabling the elderly to remain in their own homes and/or live independently in accommodation with assistance on-site. Indeed, since the onset of Covid-19, there has been a significant decrease in the number of social care clients choosing to go into traditional care home settings. This shift towards specialist housing for the elderly has significant implications for the way in which these people need to be supported by county social care services and is requiring continuous adaptations in how assistance and care is provided.

As such, with regard to section 106 contributions for this proposed development, it is important that resources are directed towards five key areas to increase capacity in Adult Social Care. These are:

- Assistive technology and home adaptation equipment – to enable people to continue to live independently
- Specialist Housing – Adult Social Care will purchase nomination rights from registered housing providers
- Adaptations and improvements to existing community facilities to enable all to be able to access these
- Provision of sensory facilities
- Provision of changing place facilities to enable those with profound physical and mental health issues (and their carers) to remain active and as independent as possible.

PRoW: Reference to the PRoW network and the ROWIP is recommended. It is imperative that open spaces within a development can be accessed through sustainable modes of transport. To encourage active travel provision and onward connectivity across the wider area, the wording of this text should be strengthened.

Policy WSNP22 Protection of residents abutting the new development

PRoW: The County Council is supportive of this policy as it is essential to ensure the existing communities and new development are linked to provide permeability and connectivity to reduce reliance upon short car journeys.

Section 18 - Community Actions

Policy CA8 - Activities for young people

Provision of County Council Community Infrastructure and Services: KCC supports the involvement of local people and businesses in the provision of activities for teenagers, including sports and activity clubs.

This would not remove the requirement for section 106 monies to support the KCC youth service to meet more specialised and complex needs of young people in the Westgate community which require continued funding to provide resources for outreach work.

Section 19 - Local housing needs assessment

Policy CA11 Local housing needs assessment

Provision of County Council Community Infrastructure and Services: Any housing needs assessment should include specialist housing for the elderly, and vulnerable adults with learning and physical requirements.

Appendices

21.1 Appendix 1 – CIL and S106

PRoW: Specific mention should be made to improving and enhancing the PRoW network to enable safe and attractive walking and cycling connections and links from new developments to community facilities. An increased population will undoubtedly add to the pressure and importance of the surrounding PRoW network. It is critical therefore to secure funding to ensure these highly regarded links are not degraded. Developer contributions are used to upgrade existing routes or create new path links that address existing network fragmentation issues. Consideration should therefore be given to the appropriate investment of development contributions into the PRoW network.

21.2 Appendix 2 – Policy SP17 of Thanet Local Plan

Provision of County Council Community Infrastructure and Services: The County Council supports the requirement of 2.05 ha land (to be provided at the cost of the developer) to accommodate a new two-form entry primary school, to include nursery (early years) provision. KCC would also emphasise the requirement for special education needs contributions in line with the increased local demand to be created by the new development, and secondary contributions towards the land acquisition and build costs for the new Thanet Park Crescent School.

PRoW: The County Council welcomes early engagement on any development where PRoW would be directly affected by the proposals and welcomes the inclusion of plans which clarify intentions for positively accommodating, diverting or enhancing paths.

Additional Comments

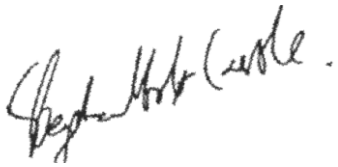
Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, confirms that there are no safeguarded minerals or waste management facilities within the Neighbourhood Plan area. Therefore, the Plan does not have be considered against the safeguarding exemption provisions of Policy DM 8: Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities of the adopted Kent Minerals and Waste Local Plan 2013-30. KCC can also confirm that the Neighbourhood Plan area is not coincident with a safeguarded mineral deposit.

The County Council would recommend that reference is made within the Neighbourhood Plan to the Kent Minerals and Waste Local Plan (as Partially Reviewed) 2013-30, as although economic minerals are absent, it is possible that waste management and/or mineral related development could be proposed in the area in the future.

Waste Management: The County Council, as Waste Disposal Authority, has no comments on the Neighbourhood Plan. It should, however, be noted that KCC is currently engaging with District Council in respect of Household Waste and Recycling Centre (HWRC) capacity to ensure that the impact of growth in the district is appropriately mitigated.

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,



Stephanie Holt-Castle
Director for Growth and Communities

This page is intentionally left blank

Thanet District Transport Strategy 2015-2031

Draft Version 2
July 2018

Contents

Foreword
Introduction
Executive Summary

1 Introduction **1**
1.1 Role and Purpose of the Transport Strategy 1
1.2 Policy Context 1
1.3 Roles and Responsibilities 3

2 Geographical Context **4**
2.1 Local Geography 4

3 Spatial Characteristics **5**
3.1 Social, Economic and Environmental Character 5
3.2 Settlements 6
3.3 Margate 6
3.4 Broadstairs 7
3.5 Ramsgate 7
3.6 Westwood 8

4 Existing Transport Network **9**
4.1 Road 9
4.2 Rail 9
4.3 Bus 11
4.4 Community Transport 13
4.5 Sea 14
4.6 Walking 15
4.7 Cycling 15

5 Key Transport Challenges and Options **17**
5.2 Existing Travel Patterns 17
5.3 Supporting Expansion at the Port of Ramsgate 19
5.4 Economic Situation 18
5.5 Car Parking Strategy 19
5.6 Quality of Life 23
5.7 Thanet Parkway Rail Station 24

6 Traffic Challenges **26**
6.2 M2 / A2 / A299 - Brenley Corner 26
6.3 B2050 / B2190 - Spitfire Junction 27
6.4 A28 / B2055 / B2051 Marine Terrace / Marine Parade 27
6.5 A256 / A255 - Dane Court Roundabout 28
6.6 B2052 - Coffin House Corner 28
6.7 Westwood Cross 29
6.8 A254 / B2052 Victoria Traffic Signal Junction 29
6.9 A28 / Birchington Square 30
6.10 A255 St Lawrence Junctions 31
6.11 A256 Haine Road / Westwood Road Corridor 31

7 Air Quality **32**

8 Planned Development **34**
8.2 Key Development Sites 34

9 The Action Plan **37**
9.1 Addressing Challenges 37
9.2 Improving The Local Highway Network 37
9.3 The Inner Circuit Route Improvement Strategy (ICRIS) 38
9.4 Westwood Relief Strategy (WRS) 44
9.5 The Future 46
9.6 Margate Junctions 46

10 Sustainable Transport Interventions and Policies **50**
10.2 Reducing the Need to Travel 50
10.3 Sustainable Development & Travel 51
10.4 Travel Planning 51
10.5 Bus Interventions / Strategies 52
10.6 Further Rail Improvements 54
10.7 Walking & Cycling Interventions 54
10.8 New / Improved Walking & Cycling Links 57

10 Informing Growth Options in the New Local Plan **63**
11.2 Thanet Transport Network Highway Model 63
11.3 New Strategic Highway Model 64
11.4 Headline Model Outputs 67
11.5 Conclusions 69

11 Potential Sources of Funding **70**
12.1 External Funding 70
12.2 Developer Funding 70

Appendices
Appendix A - Achievements from the Thanet Transport Plan 2005 – 2011
Appendix B - Policy Context
Appendix C - Infrastructure Proposals

Foreword

Left blank in the Draft Version of this document

Introduction

This Strategy replaces the former Thanet Transport Plan (2005). Its purpose is to provide a framework of transport policy to the year 2031 to support planned growth within the Thanet District. The draft Strategy is the result of joint working between Kent County Council and Thanet District Council.

The main objectives of this Transport Strategy are to:-

1. Provide a policy framework for the district which is consistent with existing National and Regional policy.

2. Support delivery managed growth identified within Thanet District Council's emerging Local Plan

3. Identify a package of robust transport improvements and interventions to enable the highway network to effectively accommodate the likely increase in travel demand across the plan period.

4. Propose a funding and delivery mechanism for identified interventions and actions.

The strategy will be subject to periodic review throughout its lifetime. Whilst review points are not fixed they could be triggered by a number of internal/external factors. These factors include changes in local/national policy, additional transport/modelling data and a change in the funding environment for infrastructure. The current infrastructure funding environment is challenging, particularly in areas where property prices are lower (hence development land being less profitable). There are also many other competing priorities for supporting infrastructure to manage growth. Therefore it is important to maintain a level of realism in relation to the affordability of development whilst providing a robust policy and evidence base to support future funding and investment opportunities.

This strategy is both ambitious and realistic. It will require a strong level of partnership working and collaboration between Kent County Council and Thanet District Council in order to ensure that it effectively delivers and meets the future needs of the local highway network and its many users.

If you would like to discuss any aspect of this Strategy, please contact us at:

Strategic Planning
Thanet District Council
PO Box 9
Cecil Street
Margate
Kent, CT9 1XZ
Telephone: 01843 577591

Email: local.plans@thanet.gov.uk

Executive Summary

The Thanet District Local Plan provides a strategy to deliver 17,140 new dwellings and 5000 new jobs in between the period 2015–2031. This figure is in line with objectively assessed needs (OAN) as prescribed in national planning policy guidance. This Transport Strategy outlines the framework for a range of transport interventions and strategies to support growth and provide a more resilient local highway network to serve future generations.

The aim of the strategy is to balance the needs of all road users, providing reliable journeys within the highway network through a package of new and improved highway routes, whilst not losing sight of core sustainability principles that are central to current planning policy and good public health.

There are four key themes that are prevalent within this strategy and these are outlined in **Figure 1.**

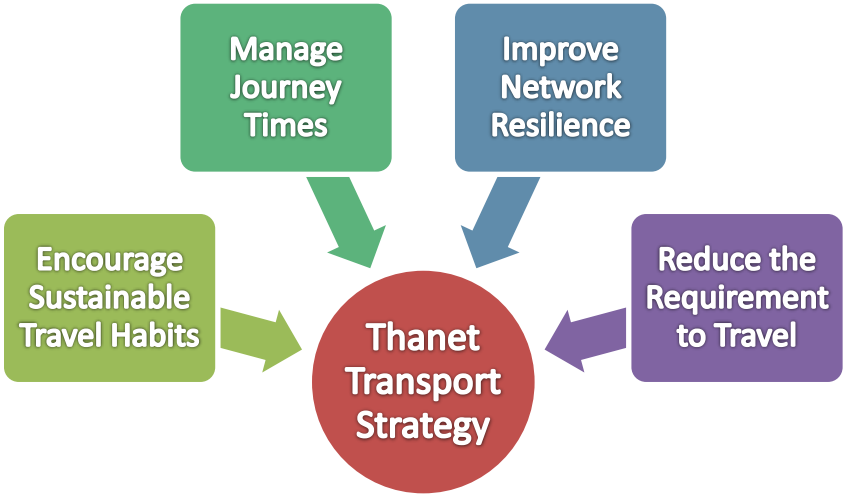


Figure 1 - Key themes of the Thanet Transport Strategy

In order to satisfy the above themes, the following interventions have been identified:-

Encourage Sustainable Travel Habits

- Introduction of new cycle and pedestrian routes.
- Improvements to existing cycle and pedestrian routes.
- Extend and improve access to bus travel through increased frequency and network coverage.
- Implement improvements to the highway network to improve bus journey time reliability.
- Provision of a new Thanet Parkway Rail Station at Cliffsend.
- Ensure that new and existing bus infrastructure is delivered or renewed with easy access in mind.
- Ensure that developments provide and have access to appropriate walking and cycling facilities.
- Car Parking Strategy

Manage Journey Times

- Provision of new & improved inner highway routes to complement existing primary road network.
- Localised junction improvements to improve traffic flow and levels of service.
- Reduction in the need to travel

Improve Network Resilience

- Provision of new & improved inner highway routes to complement existing primary road network.
- Improve journey time reliability within the local road network by providing new link roads and junction improvements to avoid congestion.
- Improved directional Signage

Reduce The Requirement To Travel

- Promotion of mixed use development where appropriate.
- Robust Travel Planning Measures to be implemented for new developments.
- Encourage Car Sharing.
- Improved communication infrastructure (High Speed Broadband)

The above actions will provide a framework to improve journey time reliability, whilst providing residents with a choice of travel modes, making essential journeys to key destinations, accessible by a range of travel modes.

The vision underpinning the Transport Strategy is as follows:

By 2031 Thanet will have a safe, accessible, affordable, sustainable, reliable and integrated transport network incorporating improved road, public transport, cycle and pedestrian routes.

The transport system will empower people to make informed choices about the way they travel, and facilitate economic growth, and social and environmental improvements across the district.

This will be reflected in a shift to more sustainable travel patterns and modes, a healthier population and a competitive low carbon economy. Whilst also making provision for essential private vehicle based journeys.

1 Introduction

1.1 Role and Purpose of the Transport Strategy

1.1.1 This Transport Strategy provides a framework to guide the development of transport based improvements and interventions within the Thanet District for the period up to 2031. It identifies priority schemes and projects that are deliverable, but whose implementation will be dependent on the rate of development coming forward, viability and the availability of resources. It is therefore a fluid document which can be adjusted in accordance with changing circumstances.

1.1.2 It will be used to facilitate effective engagement with stakeholders at both a national and local level, provide a policy position for transport improvements, and support associated funding bids. It is being prepared jointly by Kent County Council and Thanet District Council and has been one of many considerations when appraising the proposed the scale and location of strategic allocations as part of the emerging Local Plan.

1.1.3 This strategy will support, guide and be developed further through revisions to future Local Transport Plans (LTP) and the Local Plan. It seeks to achieve a balance between a range of transport and development issues at local and strategic level. The horizon period for the strategy is 2031, which is consistent with the emerging Local Plan. This strategy supports expected economic growth, it is not intended to represent an exhaustive list of all transport interventions desired within the District by local stakeholders.

1.1.4 Each significant development site will be expected to appraise its own specific highway impacts whilst contributing to this overarching strategy in line with an accompanying Infrastructure Delivery Plan (IDP).

1.2 Policy Context

1.2.1 Thanet District Council recognises the importance of working closely with Kent County Council to prepare a District Transport Strategy to improve transportation and parking to benefit business, residents and visitors.

Areas of focus include:

- Management of traffic flow and road safety within the district.
- Parking offer to residents and visitors alike.
- Identifying infrastructure needed to enable smooth travel to key destinations.
- Widening choice in relation to means of travel including measures to improve attractiveness and convenience of public transport, cycling and walking, car clubs and charging points for electric and hybrid cars.
- Managing air quality issues.

1.2.2 The District Council's Local Plan will set out a long term strategy to accommodate new housing, job creation and other development in a sustainable way. A Transport Strategy has a key role in informing and complementing the Local Plan, and will be integral to the delivery of the plan as intended.

1.2.3 This Transport Strategy includes a high level appraisal of the transport network and addresses the local and wider transport and infrastructure implications arising from associated development sites with development options being tested. It identifies strategic transport issues, key infrastructure requirements, and specific transport improvement and initiatives, whilst taking account of relevant policy at both a local and national level.

1.2.4 The outgoing Thanet Transport Plan set a number of actions to be completed. These actions and the achievements, as a result of the 2005 plan, are summarised in **Appendix A.**

1.2.5 There are a number of national, county and local strategies, plans and policies that will influence or be influenced by this Transport Strategy. These include:

- The National Planning Policy Framework (March 2012)
- Local Transport Plan for Kent 2016-31
- The Evidence Base of the Emerging Thanet Local Plan.
- Rail Action Plan for Kent
- Freight Action Plan for Kent
- Thanet Air Quality Action Plan
- Thanet Cycling Strategy
- Feet First Walking Strategy
- Vision for Kent
- Bold Steps for Kent
- Growth & Infrastructure Framework (GIF)
- KCC Road Casualty Reduction Strategy
- KCC Active Travel Strategy
- Countryside and Coastal Access Improvement Plan 2013 – 2017
- KCC's emerging Energy and Low Emission Strategy

Local Transport Plan 4 (2016-2031)

1.2.6 The preparation of a Local Transport Plan (LTP4) is a statutory requirement of Local Transport Authorities in England. It is intended to outline policies and provide a delivery plan to manage and enhance the local transport network. A LTP is intended to reflect and support District Local Plans, as such they are reviewed on a regular basis to ensure that they align with local planning policy and evolving land use scenarios throughout the county and district.

1.2.7 LTP4 was recently adopted by KCC and provides a county plan for the period 2016-2031.

It consists of five high level themes.

1. Economic growth and minimised congestion
2. Affordable and accessible door-to-door journeys
3. Safer travel
4. Enhanced environment
5. Better health and wellbeing

1.2.8 Whilst LTP4 provides a high level strategic overview of priorities at a county and district level, this Transport Strategy focusses on Thanet in more detail. **Figure 1** outlines the currently identified transport priorities within Thanet as set out in LTP4.

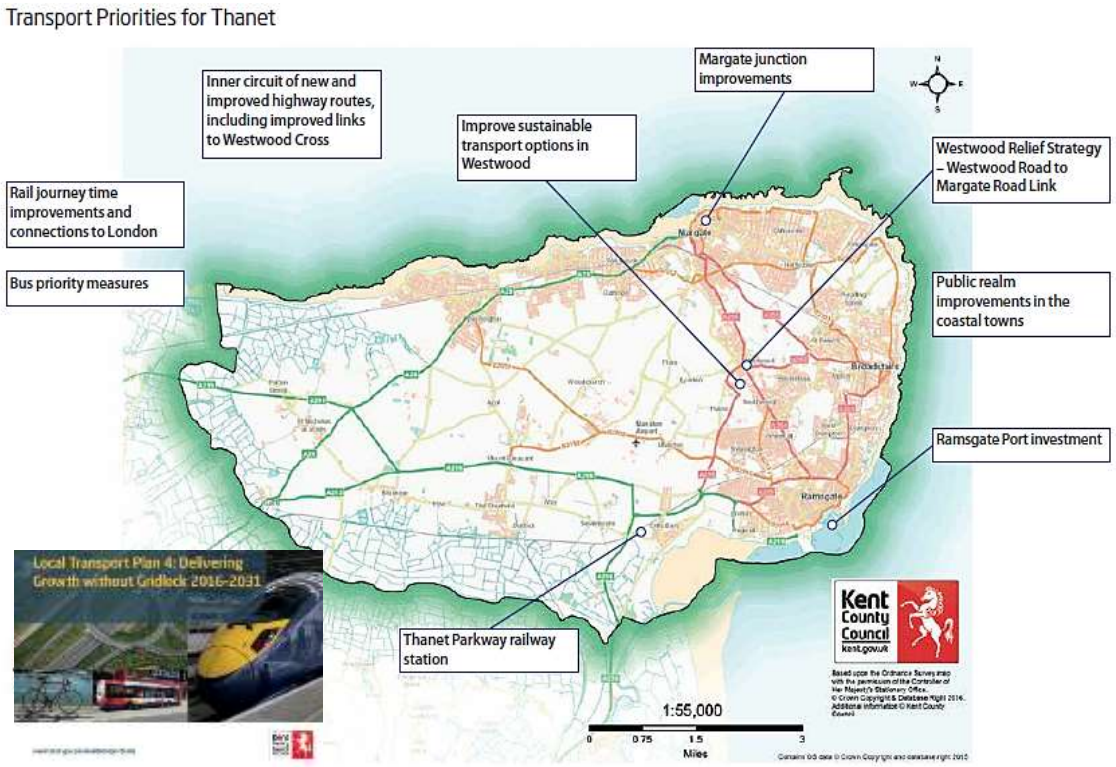

Transport Priorities for Thanet
Inner circuit of new and improved highway routes, including improved links to Westwood Cross
Margate junction improvements
Improve sustainable transport options in Westwood
Westwood Relief Strategy – Westwood Road to Margate Road Link
Rail journey time improvements and connections to London
Bus priority measures
Public realm improvements in the coastal towns
Ramsgate Port investment
Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031
Thanet Parkway railway station
Kent County Council
kent.gov.uk
1:55,000
0 0.75 1.5 3
Miles

Figure 1 - LTP4 Transport Priorities for Thanet

1.2.9 Other Policy considerations are summarised in **Appendix B**

1.3 Roles and Responsibilities

1.3.1 Kent County Council is the strategic Local authority for Kent with a statutory role providing a comprehensive range of services as the Local Transport Authority. It has a responsibility for all non-strategic highway routes within the county, which equates to 5,400 miles of carriageway and 3,900 miles of footway.

1.3.2 Amongst a number of maintenance related activities in relation to the highway asset and planning of public transport, KCC plans and delivers highway improvement scheme leads on infrastructure funding bids to government in collaboration with TDC.

1.3.3 In terms of highway and transport matters, Thanet District Council is responsible for the enforcement of on and off street parking (under the Traffic Management Act 2004). TDC are also responsible for a number of public car parks, street cleaning, bus shelters and the monitoring of air quality.

1.3.4 Officers at KCC and TDC enjoy close working relationships, which seek to ensure that district and county transport priorities are aligned. This is evident through regular stakeholder meetings, such as Local Quality Bus Partnerships (QBP), which involve stakeholders (including members) from both KCC and TDC.

2 Geographical Context

2.1 Local Geography

2.1.1 Thanet is located in East Kent, and is surrounded by sea on three sides. It comprises three main coastal towns Margate, Broadstairs and Ramsgate. It incorporates a number of attractive coastal and rural villages.

2.1.2 The geography of the area results in a very self-contained road network, as such highway routes into and out of the district is currently geographically limited. Whilst coastal towns remain integral to the economic prosperity of the district, Westwood represents the core Retail and Leisure destination for many residents.

Figure 2 - Map of Thanet's Location

2.1.3 Historically, Thanet has suffered from a perception that it is isolated from London and the rest of the country, being 75 miles from central London and 56 miles from the M25/Dartford Crossing. However, new and improved transport infrastructure is helping to change this perception. Initiatives such as the A299 East Kent Access Road at Cliffsend, improvements to the road network in Westwood and High Speed 1 Rail Links have had a positive impact on highway accessibility.

2.1.4 Thanet is now becoming a place where people seek to live and work and businesses invest. Tourism has always represented an important element to the local economy; with coastal towns being popular tourist destinations, particularly during summer months. As such the local highway network is subject to differing patterns of travel through seasonal peaks.

3 Spatial Characteristics

3.1 Social, Economic and Environmental Character

3.1.1 Thanet's estimated population at 2011 was 134,400. Work undertaken on population projections to 2031 to inform housing needs indicates an estimated population of 161,527 at that date.

3.1.2 The economy of East Kent is generally less buoyant than other areas of the county. This is partly due to perceptions of parts of it being peripheral with historically slow transport links to London. However, a number of regeneration projects and initiatives are in place and serving to diversify the employment base; for example the location of the Turner Contemporary gallery in Margate and the introduction of access to High Speed rail services within the district.

3.1.3 Furthermore, the economy has been growing and diversifying in recent years, and the Council, working in partnership with business, has set an ambitious Economic Growth Strategy for the area. The Council is working with business and other key partners to implement the Strategy.

3.1.4 Most of Thanet's coastline is designated a Site of Special Scientific Interest (SSSI), a Special Area of Conservation or a Special Protection Area. Areas at risk of flooding are mainly restricted to the lowlands of the former Wantsum Channel and a small area of Margate Old Town. Some of these designations are shown in **Figure 3**.

3.1.5 There are 20 Conservation Areas within Thanet, which include areas of special architectural or historical interest. In addition there are around 2,500 listed buildings in the district. In order to preserve the character of Conservation Areas interventions to manage traffic, such as road markings and signage require sensitive consideration. This is expressed in the District's Conservation Area Management Plan (2008)[1].

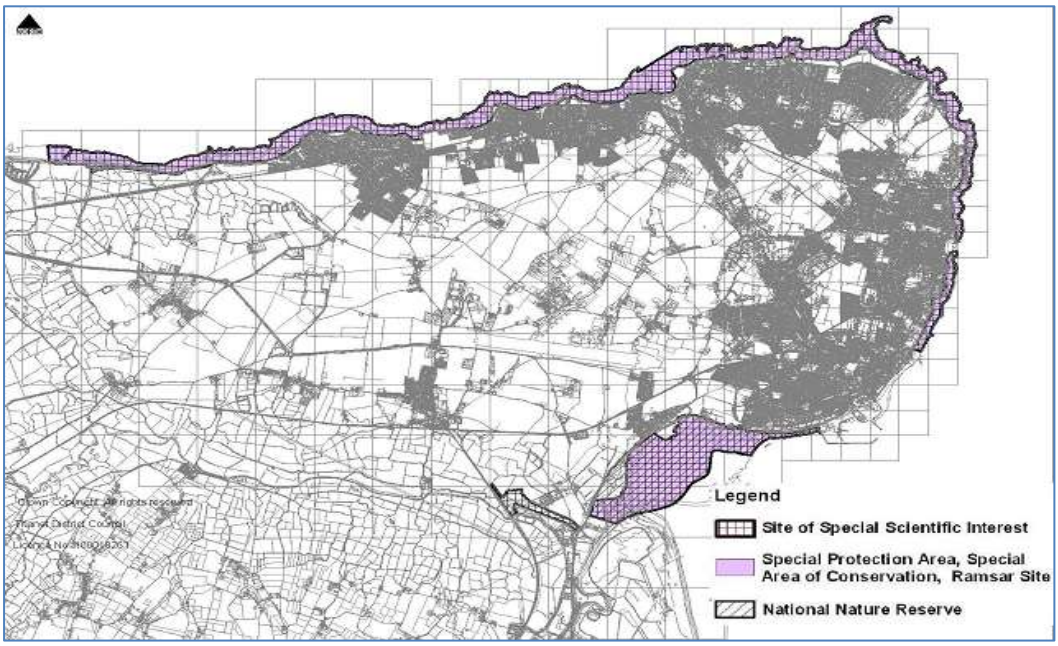

Legend
Site of Special Scientific Interest
Special Protection Area, Special Area of Conservation, Ramsar Site
National Nature Reserve

Figure 3 - Designations in Thanet

[1] http://www.thanet.gov.uk/pdf/Conservation_Areas_Management_Plan2008.pdf

3.1.6 There are two junctions in Thanet which show levels of nitrogen dioxide (NO_2) exceeding the recommended health objective, in both cases due to road transport emissions. These junctions are at The Square, Birchington, and High Street St Lawrence, Ramsgate.

3.1.7 It was found that Heavy Duty Vehicles (Heavy Goods Vehicles plus buses) contribute disproportionately to poor air quality. For example, at The Square HDVs produced a third of emissions of nitrogen oxides but were less than 5% of traffic[2].

3.1.8 In November 2011 an urban wide Air Quality Management Area (AQMA) was created and this includes both junctions (figure 4). This is because the two existing Areas are intrinsically linked to the road network across the wider district and by covering all heavily trafficked areas a coherent strategy can be developed. The one AQMA will then cover areas that will potentially exceed acceptable limits in the future.

3.2 Settlements

3.2.1 Thanet includes the three main coastal towns of Margate, Ramsgate and Broadstairs. These together with the smaller settlements of Westgate on Sea and Birchington on Sea are located within an almost continuous urban belt, with limited sections of green separation between some of them. Within the District's rural area there are seven villages of varying size, each having its own individual character. The furthest of these is about 5 km from the urban area containing the towns.

3.3 Margate

3.3.1 Margate is a popular tourism resort and has a strong cultural and creative community. The "Dreamland" amusement park has reopened featuring historic rides, including the scenic railway, and other attractions, and also hosts events, such as nationally recognised music concerts.

3.3.2 Margate Railway Station is a short distance from the Margate main sands and gives direct access on foot to the seafront and its amenities. In March 2010, Jacobs was commissioned by Kent County Council to develop a conceptual master plan for improvements to the public realm of Margate Seafront and Station Approach[3]. The main features are to include:

- A less dominant highway environment with reduced road widths and highway furniture throughout
- A series of new and improved public spaces along the frontage
- Controlled pedestrian crossing points at key locations along the frontage
- Widened pavements and promenade where possible

[2] http://www.thanet.gov.uk/pdf/Thanet_AQAP_2011_DRAFT.pdf
[3] Margate Seafront & Station Approach Public Realm Improvements Scheme Development & Stakeholder Engagement Report

3.3.3 Margate town comprises narrow streets with properties fronting directly on to the road, many of which fall within conservation areas. Some of these streets are too narrow to safely accommodate two way flows and consequently follow a one-way system. The streets follow a comprehensive grid layout which offers good connectivity on foot and makes walking between key destinations in the town likely to be quicker than the car. Some of the existing pedestrian crossing points over the major arterial routes are located just off of the walking desire line which can sometimes result in additional interruptions to the free flow of traffic.

3.3.4 The Turner Contemporary has dramatically increased visitor numbers to the town but does not have on-site parking provision. Parking for the gallery is located in College Square, some 0.6km from the site and is accessed via a walk through Margate Old Town. The increased footfall in this area has had a significant effect on the commercial viability of the Old Town with more than 35 new businesses having opened in the first 18 months after the opening of the gallery (April 2011) and existing shops reporting a significant increase in takings.

3.3.5 Car parking can significantly influence the success of a town centre. KCC undertook a car parking survey in 2007 over a bank holiday weekend to assess the availability and utilisation of car parking within the town centre. Margate was found at that time to have 847 on street parking spaces of which an average of 69% were utilised during the week and 64% at weekends. There are 1,795 off street parking spaces of which 52% on average were utilised during the week and 26% at weekends. It is clear that parking capacity was abundant at that time but with the success of the Turner Contemporary and the upsurge of the Old Town a new Parking Strategy has been called for to take account of future regeneration projects.

3.3.6 The Queen Elizabeth the Queen Mother hospital is located on the edge of the town which is a facility that serves a large proportion of East Kent, bringing with it associated trips from outside of the district.

3.4 Broadstairs

3.4.1 Situated on the Thanet coastline between Margate and Ramsgate, Broadstairs is a popular holiday destination and has an array of festivals held throughout the year attracting tourists and locals to the town and seafront, whereby the main streets are closed to traffic. Its position in the district means that trains to London can go in either direction, via Canterbury or via Margate.

3.4.2 Due to its status as a thriving tourist location, peak season visitor parking needs to be reviewed and this could be done as part of a wider parking strategy for Margate, Broadstairs and Ramsgate.

3.5 Ramsgate

3.5.1 Home to the Royal Harbour Marina (just 35 miles from the French coast) and a member of the ancient confederation of Cinque Ports, Ramsgate is connected to the national road network primarily through the A299 Thanet Way and along the A256, East Kent Access Road, to Dover (and onwards to the Channel Tunnel), to which improvements have recently been completed.

3.5.2 Serving fishermen and yachtsmen, the Marina is also a tourist site. The town's Royal Harbour is unique in the UK and, like Broadstairs, the economy is underpinned by the tourist industry. Much of the town is Regency and Victorian and there are around 900 listed buildings.

3.5.3 The Port of Ramsgate has an access tunnel from outside of the town thereby avoiding town centre congestion except for times when this link is closed for maintenance.

3.6 Westwood

3.6.1 This area is located at the centre of the district, at the intersection of the A254 and A256. Westwood now represents the District's principal retail centre. It is also gradually developing into a residential settlement. The EuroKent site, which was originally allocated for employment, has recently been granted consent to build 550 new homes within the application site in addition to the 1000 new homes planned for Land North Of Haine Road. Recent improvements to the road network in the area have almost created a "loop" around the core shopping area, and this has led to improved traffic flows in the locality.

Figure 4 - Westwood Roundabout (A256/A254)

4 Existing Transport Network

4.1 Road

4.1.1 Thanet is well connected to the UK motorway network via the A299 Thanet Way (a dual carriageway), which in turn links the District to the M2. The East Kent Access Road (A256/A299) creates a high quality road connection to surrounding principle road corridors, which in turn link Thanet to the strategic road network (SRN) of the A2, M2 and M20 which are managed by Highways England.

4.1.2 The A28 (Canterbury Road) links Margate, Westgate on Sea and Birchington into Canterbury District and on to Ashford before ending on the East Sussex border. The A254 (Ramsgate Road) and A255 (St Peters Road) connect Margate, Ramsgate and Broadstairs. The A254 and A256 between Margate Ramsgate and Broadstairs serve as inter urban routes with Westwood being located at the point where these two routes intersect.

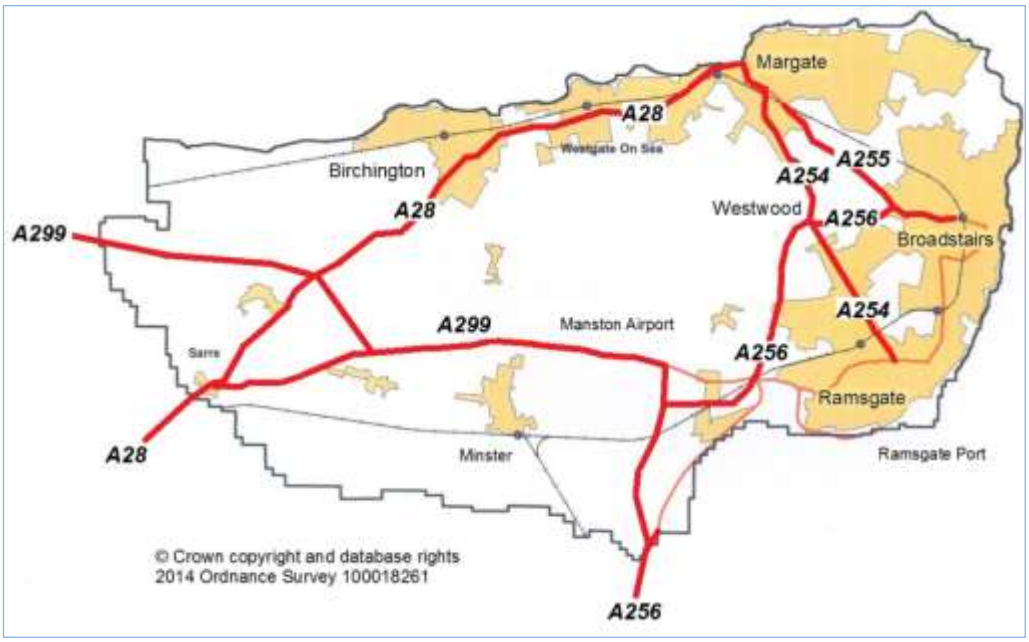


Figure 5 - Principal Road Links Around Thanet

4.1.3 All adopted public roads in Thanet are managed and maintained by Kent County Council as the highway authority. Those under KCC's responsibility can range from principal 'A' roads to the dense urban networks and rural lanes.

4.2 Rail

4.2.1 Thanet is currently served by seven railway stations and has direct services to London, Canterbury, Ashford and Dover. In December 2009 High Speed One services commenced from Ramsgate to London St. Pancras reducing rail journey times to 1 hour and 16 minutes (figure 5). For purposes of comparison, the mainline journey time to London Victoria is around 2 hours and to London Charing Cross up to 2 hours and 30 minutes.

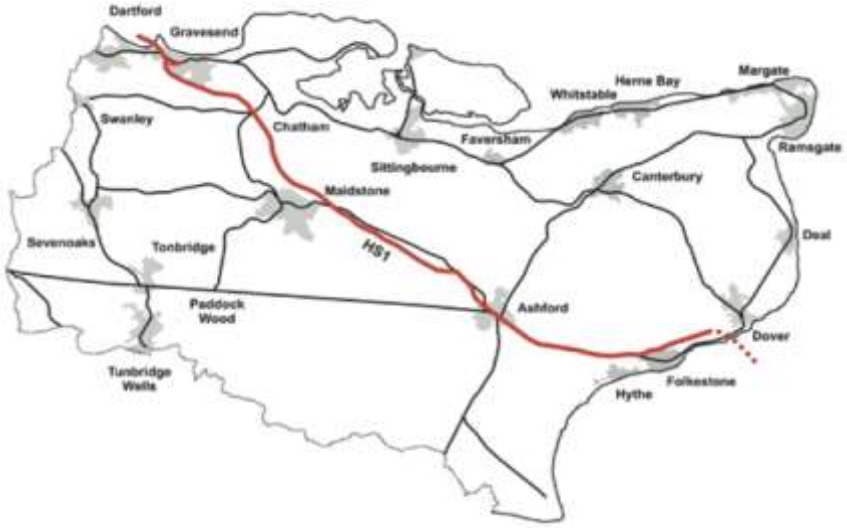


Figure 6 - The Kent Rail Network

4.2.2 The three principal stations are Ramsgate, Broadstairs and Margate with routes in three directions:

- London via Faversham and Chatham
- London via Canterbury and Ashford
- Dover and Folkestone via Sandwich

4.2.3 Parking availability at Thanet's existing rail stations is generally poor, which has an impact on the attractiveness of this form of transport for the local population. The delivery of a new Parkway Station at Cliffsend would provide high quality and convenient parking offer improving the attractiveness of rail travel.

4.2.4 The Kent Route Utilisation Strategy (January 2010) is Network Rail's strategic vision for the railway up to 2020, it has two possible areas for improvement in Thanet:

- Cutting journey times from London St Pancras to North Kent (Thanet via Medway) to promote economic growth. Current journey times are restricted by line speeds in Gravesend and Medway and the number of stations served on the route.

- The possible provision of a new Thanet Parkway station to assist in economic regeneration in Thanet, and improve connectivity with Discovery Park (just in Dover district), which provides a significant source of employment for Thanet residents.

4.2.5 In January 2012 the East Kent Resignalling Project was completed on routes from Sittingbourne to Minster via Ramsgate and from Faversham to Buckland Junction via Canterbury East. This renewed the existing equipment, which dated from the 1950s.

4.3 Bus

4.3.1 Approximately 97% of the local bus network in Thanet is provided on a commercial basis predominantly by Stagecoach. Some services are subsidised by KCC where it is considered there is a social need not met by the commercial network. KCC has clear criteria to help identify which services receive subsidy. These mainly include rural, evening and weekend services providing access to education, food shopping, health care or employment.

4.3.2 Thanet's predominant bus service provider Stagecoach is one of the largest operators in the UK and currently operates throughout East Kent. The introduction of the 'Thanet LOOP' in October 2004 was an immediate success and the existing Margate and Ramsgate local services the 'Thanet STARS' were upgraded as a result to complement it.

4.3.3 In an era when many districts have seen a net fall in the number of bus passengers (despite the introduction of free travel for over 60s), this is a remarkable achievement. Stagecoach in East Kent reports that bus use in the Thanet District since 2004 has been as follows:

Year	Passenger boardings per year commencing 1st April
2004	4,157,610
2005	5,313,565
2006	6,358,351
2007	6,761,854
2008	7,288,773
2009	7,469,328
2010	7,737,112
2011	7,957,379
2012	7,824,858
2013	8,167,933
2014	Data Unavailable
2015	8,973,879
2016	8,850,442

4.3.4 As referred to above, a key reason behind this transformation was the re-casting of the local bus network using DfT Kick Start funding and investment from Stagecoach to create a new route called 'The Thanet Loop'. This offered modern accessible vehicles providing a frequent service on a simple route connecting the main town centres and the new development at Westwood Cross. Its introduction was backed with an extensive marketing campaign.

4.3.5 It has been developed with improvements to frequency, length of operating day and investment in a new fleet of larger vehicles with improved engines for better efficiency and lower emissions. Other commercial routes have also received similar improvements, with the 8/8A service in particular benefitting from an investment of £2.5million in new Euro 6 double deck buses in 2016 and revisions to the routes created new links across the district.

Quality Bus Partnership (QBP)

4.3.6 All bus routes within Thanet are supported by an established QBP between three partners – the commercial bus operator (Stagecoach), Kent County Council and Thanet District Council. This group meets quarterly and includes attendance by council members from both Local Authorities.

4.3.7 The purpose of the QBP is to co-ordinate all matters which might affect bus operation, including potential investment opportunities, which could range from new bus stock, localised highway improvements to complement bus routes to new highway infrastructure associated with new development proposals.

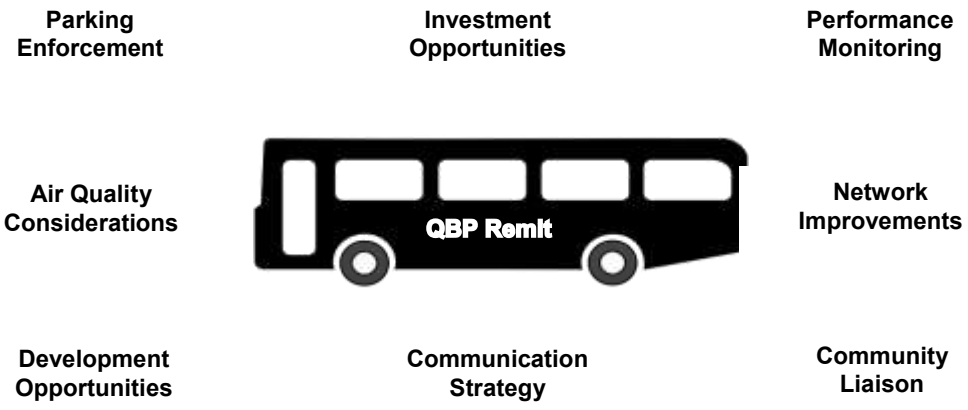


Figure 7 - QBP Roles

Young Persons Travel Pass/16+ Travel Pass

4.3.8 This is a concessionary scheme to assist parents with the cost of travel to and from school and evolved from the Kent Freedom Pass introduced in 2009. The current cost of the pass is £280 (£400 for the 16+ pass) and allows for travel between the hours of 6am and 7pm (at all times 16+ card).

4.3.9 The County Council currently issues just over 24 000 YPTP passes and 6500 16+ passes across Kent, this underlines KCC's ongoing commitment to reducing congestion especially at peak times. From September 2017 Stagecoach has launched a new initiative which allows for YPTP passes to be accepted at all times of the year and on all evenings and at weekends.

English National Concessionary Travel Scheme (ENCTS)

4.3.10 KCC administers this nationwide scheme in Kent for disabled people and those who have reached the state pension age. This allows for free travel between the hours of 0930 and 2300 Monday to Friday and anytime on Saturdays and Sundays.

Bus Stop Infrastructure

4.3.11 KCC hold overall responsibility for bus stop infrastructure in Thanet and across Kent overall. A contract is in place for the maintenance of existing bus stop assets and the Authority also considers requests for new bus stops and for the re-location/adaption of existing bus stops.

4.3.12 In Thanet, Stagecoach are proactive in assisting with the management of bus stops on their commercial corridors, performing the maintenance and repair

function (cases and flags) for the sites in question. It is important that bus stop infrastructure is considered as part of the planning process and that a) bus stop locations are identified early on within developments and b) appropriate financial contributions are included. More widely it is also important that developments consider bus access with respect to their design, for instance with respect to turning circles, road widths etc.

4.3.13 The original Thanet Loop scheme intended to make as many bus stops as possible fully accessible to support the new accessible buses being provided. The on-going development of bus infrastructure within Thanet has been a key component in the development of the existing network.

4.3.14 Bus shelter maintenance falls under the jurisdiction of TDC and this is currently administered through a term contract with the private sector, which devolves the responsibility for maintenance to the private sector with added revenue from relevant stops forming the funding stream to make this commercially viable. The current maintenance contract is reaching end point, and the delivery of good quality infrastructure will form part of future negotiations during 2017/2018. It is essential for any future contract to include a level of flexibility to enable new shelters to be provided within new development sites.

4.4 Community Transport

4.4.1 Thanet Community Transport Association provides accessible minibuses for residents who are unable to use other public transport. This is a door-to-door dial-a-ride service timetabled to operate to/from selected destinations each day.

4.4.2 Kent Carrier Service – Is a flexible dial a ride service that takes members directly from their door to useful destinations in their local area. All services are operated with wheelchair accessible vehicles and trained drivers. The scheme provides for those with a mobility impairment/medical condition, who live more than 500 metres from a bus stop/railway station or who are over 85 years of age.

4.5 Sea

4.5.1 Ramsgate Port has facilities for handling freight and passengers and is operated by Thanet District Council. These facilities include the ability to handle Roll on – Roll off (Ro Ro) vessels up to 175m and 6.5m draft, dedicated warehousing for transhipment and storage, and coach, car and foot passenger handling. In addition Ramsgate Marina also enables private vessels to be moored.

4.5.2 The previous operator of Cross Channel ferry services to both Dunkerque and Ostend ceased trading in May 2013 and a new operator is being actively sought. The Port has become a construction and operation base for three nearby offshore wind farms and the Council is currently exploring a range of freight and other operational options for the Port.

4.5.3 It has good connectivity with a dedicated Port access road and tunnel that diverts traffic away from the town and delivers customers direct to the Port. Because the route from the M25 to the Port of Ramsgate does not rely upon the M20/A20 corridor it is largely unaffected by the long delays which result from the implementation of Operation Stack.

4.5.4 With space for up to 550 freight units on site, specialist logistical equipment and storage areas only metres from the berth, turnarounds can be kept short. A focus on pre-booked, just in time services that are not affected by seasonal traffic variations guarantee customers can get to the Port without delays, providing a cost-effective way forward for the European freight distribution market.

4.5.5 The Port has an existing capacity of 500,000 units and the potential for up to one million. Cross channel freight is already expected to increase by 1.43 million units per year by 2035, and the Port of Ramsgate can play a significant part in providing additional capacity. This would give increased resilience to the European logistics market and support the flow of traffic across the South East of England especially the Thames corridor and would potentially link into the third Thames crossing, diverting traffic east rather than south to Dover and the Channel tunnel.

4.5.6 The Port has a strong vision for phased future development starting with a new double deck linkspan berth. This would give the Port a second double deck berth that would improve resilience whilst unlocking significant additional capacity and the Council has started to develop the business case to bring this forward.

4.5.7 The second phase would include the development of a logistics hub at Manston Business Park. This would provide additional off-port vehicle storage to act as a pre-parking area, supporting the maximum capacity of one million units. The hub would also incorporate storage facilities to allow for post and pre-assembly for loads for onward transport and units for advanced manufacturing.

4.6 Walking

4.6.1 Thanet has a road network which largely accommodates footways on both sides, not only in the main towns and seaside settlements but also along the distributor routes connecting them. In the rural areas the Public Rights of Way network offers walkers (and sometimes horse riders and cyclists) a good connection across open countryside to the coast, rural settlements and end destinations, with some circular walks offering superb views of both coast and countryside combined. The Thanet Coastal Path follows the longest stretch of chalk coastline in the country, the route having been set up in the 1990s. The Viking Coastal Trail is good for beginner walkers, offering good views out to sea. There are other signposted walks in Thanet, including the Turner and Dickens Walk linking Margate and Broadstairs.

4.6.2 In 2005 “Feet First,” a local walking strategy for Thanet was published. This identifies barriers to walking in the District and aims to promote and enable walking, for example by specifying a network of routes for improvements.

4.6.3 KCC’s Countryside and Coastal Access Improvement Plan 2013 is the overarching policy document for improvements to network of Public Rights of Way and recreational walking access in Kent.

4.6.4 Active Ramsgate is a recently completed partnership project from Ramsgate Town Council and Explore Kent to help develop Ramsgate Town as a destination for walking and cycling. The project included a number of promoted self-guided walks and the establishment of three new walking trails; ‘The Contra Trail’, ‘See it all’ and ‘Ramsgate Town Rounders’. On the back of this initiative Ramsgate Town is applying to be a ‘Walkers Welcome’ town. The Turner and Dickens Walk and Thanet Coastal Path provide longer distance promoted trails. All promoted routes have accompanying maps and leaflets that provide all the information you need for an enjoyable day out. For further information see - Parks and outdoor activities - kent.gov.uk

4.6.5 Following the Marine and Coastal Access Act 2009, Kent has been working with Natural England to establish its section of the emerging “England Coast Path” national trail. Establishment of sections from Folkestone to Whitstable are a key part of that initiative, although the focus of walking remains in and around the Coastal Promenades there is wider network of Public Rights of Way of around 106km.

4.7 Cycling

4.7.1 The Viking Coastal Trail (27 miles) roughly encircles the former Isle of Thanet providing connections between the towns, leisure and heritage attractions, as well as the National Cycle Network. Other routes have designated facilities to make cycling more attractive, such as the shared use footway/cycleways adjacent to New Haine Road. The provision of toucan crossings and facilities such as cycle parking at key locations (e.g. stations and shopping centres) also helps to improve the attractiveness of cycling in the district.

4.7.2 There is an existing Thanet Cycling Plan dated December 2003, with many of the targets within this document having already been achieved, notably:

1. The completion of the Viking Coastal Trail (VCT) in June 2001, linking Thanet’s town and villages together with a 45km (28 mile) circular route and joining them to the National Cycle Network.

2. The continuing review of the VCT, improving signage and surfaces on the route, using funds from the Connect 2 project to complete the circular route and maintain it as an asset for Thanet.

3. Improvement of road junctions, Westfield Road/Caxton Road/Maynard Avenue/Brook Avenue/Crow Hill Road to reduce traffic speeds and give better access to pedestrians and cyclists

4. Construction of Dane Valley cycle route linking Marine Drive, Margate to Vicarage Street, St Peters and linking into the safer routes to school scheme.

5. Scheme to reduce traffic speeds at Nethercourt Hill, Canterbury Road East, High Street, Margate, Reading Street, Albion Street, Broadstairs and on various estate roads in Thanet with links to encourage more walking and cycling.

6. Cycle links from Margate Station and Broadstairs Station have been revised and improved.

7. The building of safe crossing facilities on Westwood Road fronting St George's C of E School.

8. Cycle route connections at Westwood, in the vicinity of Westwood roundabout.

9. New cycle path connection between A253 Minster and Sandwich Road Cliffsend to connect into NCN1.

5 Key Transport Challenges and Options

5.1.1 The purpose of this strategy is to manage growth within the district, whilst providing an improved quality of life for Thanet's residents by addressing key transport related challenges.

5.1.2 For most road users, congestion and delay is the biggest issue related to transport, with previous studies suggesting that congestion was a problem for the majority of the time when undertaking general road journeys[4]. It has also been forecast that, based on recent patterns of car usage, the housing growth planned for Kent could result in an extra 250,000 car journeys on the county's roads every day[5]

5.1.3 There is a general recognition that car ownership is the largest single component of traffic growth, with journeys to and from work and for educational purposes being one of the biggest contributors to peak hour road congestion.

5.1.4 Statistical data from the 2011 census identifies that whilst Thanet is geographically smaller than other districts within Kent, the number of households are comparable. The level of private vehicle trips in the district is commensurate with the national average. It is relevant to note that the percentage of bus use is the second highest in Kent, which suggests that existing bus services are a feasible option for existing residents.

5.2 Existing Travel Patterns

5.2.1 To gain a perspective on current and future transport demographics, it is valuable to examine existing sources of data in relation to Transport matters. Data sourced from the 2011 census provides some insight into the current travel habits of Thanet Residents when compared to local and national trends. **Figure 8** outlines the percentage of the resident population at different levels of car/van ownership in the District.

5.2.2 This data suggests that 30% of the district's population live in households with no cars/vans compared to just 20% for the whole KCC area. The average car ownership across the district is the lowest in the county

5.2.3 This can have accessibility implications for particular groups as when the car is being used (for example during the working day) other household members do not have access to the car and must rely on Public Transport. Likewise, where households have no car/van reliance on other forms of transport is high.

5.2.4 This theory would appear to be supported by further analysis of travel to work dataset, see **Figure 9** below, which suggests that the use of bus travel is higher than the local (Kent) Average.

[4] DfT (2008), Public attitudes to congestion and road pricing
[5] Kent County Council (2010), Growth without Gridlock – A transport delivery plan for Kent

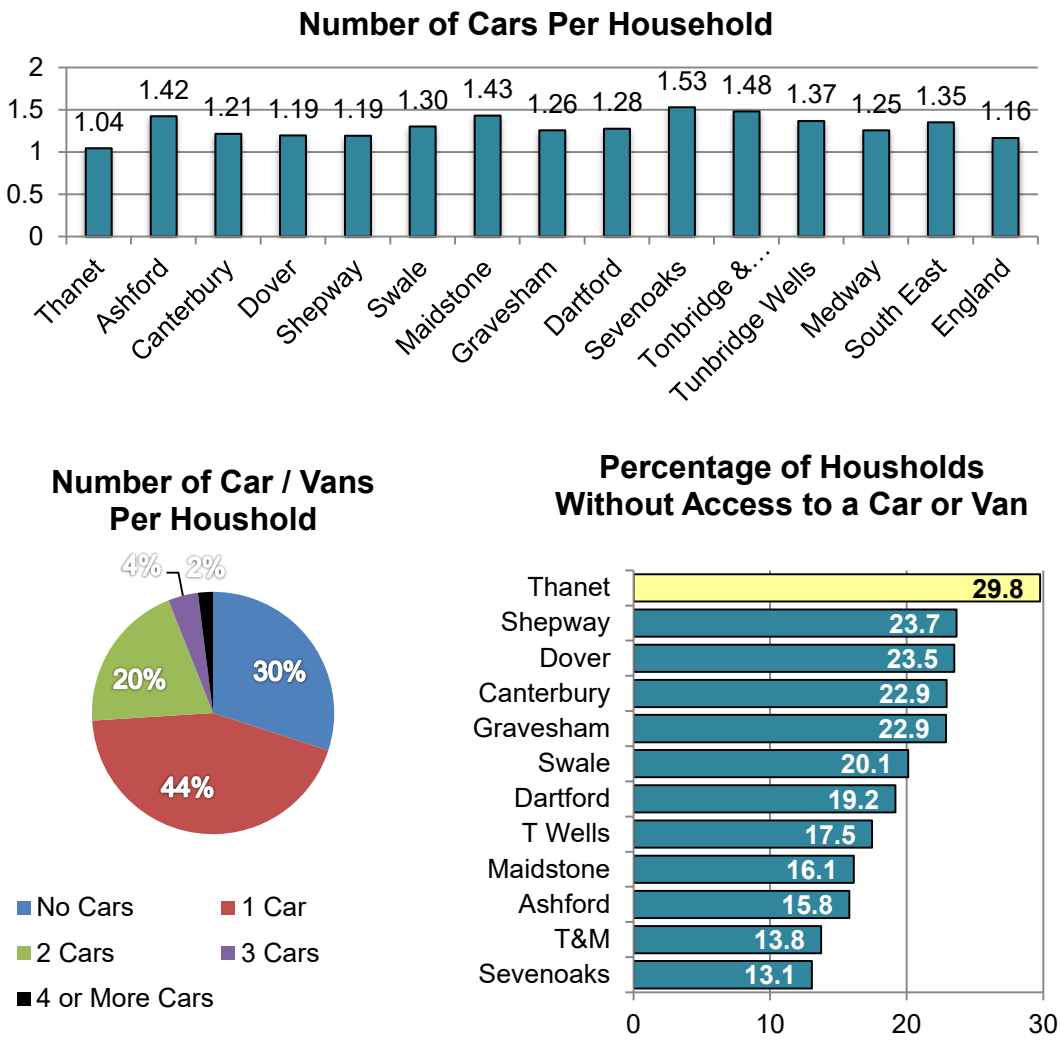


Figure 8 - Car Ownership (Data Sourced from 2011 Census)

Area	Working from home	Rail	Bus, minibus coach	Motorised Vehicle	Passenger car or van	Cycling	Walking	Other
Ashford	6.9	6.7	2.6	64.9	5.4	2.5	10.3	0.5
Canterbury	6.3	5.4	5.0	59.3	4.9	2.7	15.8	0.5
Dartford	3.6	17.9	5.2	60.1	4.4	1.1	7.3	0.5
Dover	5.3	3.8	3.6	65.7	6.2	2.2	12.4	0.8
Gravesham	3.9	11.3	6.7	62.2	6.3	1.0	8.1	0.6
Maidstone	6.0	6.9	3.8	65.2	4.9	1.2	11.6	0.5
Sevenoaks	8.0	20.4	1.6	57.4	3.6	0.8	7.5	0.7
Shepway	5.6	4.1	4.9	64.3	5.5	1.8	13.0	0.8
Swale	5.0	7.1	2.0	66.3	5.5	2.2	11.3	0.6
Thanet	5.3	4.1	6.3	61.7	6.9	2.5	12.5	0.7
Tonbridge & Malling	6.3	12.4	2.2	64.3	4.4	1.4	8.6	0.5
Tunbridge Wells	8.5	14.9	2.3	53.8	4.0	1.2	14.8	0.6
Kent	6.0	9.5	3.8	62.2	5.1	1.7	11.2	0.6
England and Wales	5.4	9.0	7.3	58.9	5.1	2.9	10.7	0.6

Figure 9 - Method of travel to work by percentage split (data sourced from 2011 Census)

5.3 Supporting Expansion at the Port of Ramsgate

5.3.1 Ramsgate's Port and Royal Harbour is located 76 miles from the heart of London, and close to continental ports and harbours across the North Sea and Straits of Dover. The commercial port has, until recently; operated ferry services to both Dunkerque and Ostend and has become both a construction and now operation and maintenance base for three nearby offshore wind farms. As owner and operator of the Port, Thanet District Council has published a Maritime Plan to provide a high level guide for the future operation, development and management of the port and adjacent Royal Harbour.

Figure 10 - Ramsgate Port

5.3.2 The Port includes 32 acres of commercial port land, three modern Ro-Ro bridges, a fast ferry service capability, tri-berth simultaneous operation, full passenger services and freight vessel facilities. This plan reflects the objective of accelerating local economic growth recognises the Port as a strategic asset and outlines how it is expected to grow over time. Its vision includes:

- Safeguarding the commercial port and its commercial shipping facilities.
- Supporting development of new marine infrastructure and ro-ro expansion opportunities, as well as ferry lines.
- Capitalising on potential to grow the port's existing role as an engineering and logistics base centred around off-shore renewable energy installations.
- Pursuing expansion of bulk commodity trade.
- Promoting capabilities to accommodate cruise ship calls.

5.3.3 The Port benefits from a dedicated access road enabling road traffic to connect directly to the principal road network without passing through the built up area and local road network.

5.4 Economic Situation

5.4.1 The prevailing economic situation in recent years has affected Thanet as it has elsewhere in the country. The local economy is focused on tourism, cultural and creative industries and the service sectors, particular in the public sector, with a high proportion of small businesses. Thanet's towns have their own unique identities and heritage on which to trade, for example Margate's connections with the artist Turner and the country's only Royal Harbour in Ramsgate.

5.4.2 Thanet has strong economic connections with the surrounding districts. The East Kent Access Road (encompassing both the A299 and A256) provides dual carriageway from the M25. Its completion means that there is a direct dual carriageway connection between Sandwich, Ramsgate and the motorway network to the London arterial motorways. It also links Thanet and major economic assets including Manston Business Park, the Port of Ramsgate and Discovery Park to the UK's main arterial strategic road network.

5.4.3 The introduction of High Speed 1 (HS1) rail services have reduced commuting time from London St. Pancras to Ramsgate to 76 minutes and Margate to 88 minutes, from almost two hours. Although journey times remain longer than those to comparator locations (such as Folkestone), recently secured Government investment is set to lead to further reductions. This route had also facilitated access from Thanet to North London rather than just to the South. Efficient transport connections and improved journey times can help make the area more accessible and therefore more attractive as a location for business investment and commuting.

5.4.4 Thanet's Economic Growth Strategy for 2016 to 2031 identified key areas for the Thanet economy to grow quickly and attract significant investment:

Transformational Initiatives

1. Developing the Port at Ramsgate
2. Investing in high value manufacturing and engineering across Thanet and East Kent
3. Positioning Thanet as a global agritech hub
4. Promoting Thanet's broader cultural/leisure offer
5. Cultivating the creative industries across Thanet
6. Designing enterprise into communities
7. Long term feasibility modelling for Margate and Ramsgate

Foundational Priorities

1. Working with businesses, schools and FE/HE providers to improve workforce skills
2. Developing and implementing measures to support new and small businesses in the District, particularly the provision of managed workspace and focused business support
3. Ensuring major employment sites in Thanet are managed and promoted effectively
4. Working with local partners to ensure that the visitor economy continues to evolve, reflecting fast-changing patterns of demand.

5.5 Car Parking Strategy

5.5.1 Car parking is an important issue for residents, business and visitors. Kent County Council is the highway authority for the district, and TDC work in close partnership with KCC on all parking related matters for the district.

5.5.2 The ongoing aspiration to diversify the local economy, leisure and tourism (for example; the opening of Turner Contemporary in Margate and the re-opening of Dreamland) will attract more people to travel to the district and the towns thus generating demand for parking. In parallel there is potential for local growth in car ownership. While the Local Plan aims to facilitate greater use of alternative modes of travel it remains very important to ensure that parking provision is properly managed, sufficient and suitably located for those who elect to travel by car.

5.5.3 The District Council has prepared a Parking Policy (2015-20) to provide a framework for effective parking management, and to support the Council's strategic objectives as outlined in the Corporate Plan and links in with the Thanet District Transport Strategy, Local Plan, Regeneration Strategy and the Destination Management Plan. It is important that we have a consistent approach across the whole of the district. Some of the aims of the Parking Policy are:

- Ensure the safety of all roads users by restricting parking in inappropriate locations;
- Be fair in setting fees and charges that are related to supply and demand, encouraging use of parking spaces and incentivising people to come into town centres and other attractions, and have a consistent approach across the district;
- Support the viability of Thanet's economy and regeneration initiatives that form part of this;
- Provide a clear policy for enforcement which will allow the council to deal with parking issues fairly and consistently, ensuring an efficient and effective enforcement function;
- Ensure the appropriate control of residents' parking, especially where this is affected by other parking demands;
- Seek to ensure that the provision, location and safety of public car parks are of a good quality;
- Provide a consistent and clear approach for different types of parking permits;
- Seek to ensure a clear approach towards parking for disabled persons including dealing with misuse of the blue badge scheme;
- Consider parking's contribution to environmental agendas (for example, if demand of the current electric charging points increases then the council will look at increasing the number of charging points within the district's car parks with external funding if available); and
- Ensure that the policies and services are transparent and provided consistently throughout the district.

5.5.4 Exploration of digital solutions to support parking services will become an on-going action within the service to continue delivering a more cost effective and efficient service for the public. These will include:

- New smartphone handhelds
- Virtual permits
- Residents visitors permits purchased on line
- Mobile CCTV/ANPR camera technology for enforcement
- Extending our online permits system to online renewals.

5.5.5 New schemes will be introduced to help residents and businesses to be able to get a turnaround of visitors using the bays close by. Parking services will explore a number of sites around the district for pay and display and parking schemes.

5.5.6 Its objectives include making more productive use of existing provision and regulation of on and off-street parking to help keep traffic flowing, improve pedestrian and motorist safety, facilitate business deliveries and enable people to park near their homes and shops. The Policy also addresses charging policy, enforcement and signage.

5.5.7 The established benefits of providing parking enforcement are to:

- To improve the safety of road users;
- To assist the free flow of traffic and reduce traffic congestion, especially for emergency services:
- To assist and improve bus movement;
- To ensure effective loading/unloading for local businesses;
- To provide a turnover of available parking spaces in areas of high demand;
- Increase protection of disabled spaces, bus stops, loading bays, taxi ranks and residents parking areas; and
- To promote and enhance the health of the local economy.

5.5.8 The Parking Policy seeks to ensure that parking is of good quality, safe and suitably located. It also indicates that new pay and display parking locations will be investigated as well as consideration given to potential disposal of some car parks. It is intended that existing off street town centre car parks should continue to be safeguarded.

5.5.9 The Parking Policy acknowledges the need to improve existing coach parking, and to explore options for locating increased provision. In particular replacement provision is expected to be required for Margate following construction of the Turner gallery and adjacent land. There is currently no specific coach parking provision for Ramsgate, and it is anticipated that additional provision will be required for Broadstairs to address peak demand.

5.5.10 Park and ride is an alternative solution that has been considered previously. However unlike most towns that have a scheme Thanet is unique by having four town areas that have a greater visitor demand during the summer months only. Most schemes offer drivers an easier way to leave their vehicle at an out of town location and then use a quick service to travel in to town without delays. Thanet does not have a central point that could be used for all towns that would give drivers the same opportunity.

5.5.11 A large amount of investment would be required for such a scheme not only for the land but for the on-going operating costs. It may be possible with partners to look at a scheme for the summer period only covering the towns that get traffic congestion.

5.5.12 There is also a role for planning policy to achieve the following:

- Safeguard town centre car parks but with flexibility to accommodate situations where sites are under used and where development might facilitate more suitably located or better quality provision to be delivered elsewhere
- Set out guidance on the level of car parking to be provided for in new developments including within the individual town centres, and to identify areas where additional on-street parking may not be required
- At Westwood, to consider how car-parking might be more effectively provided as part of a wider redesign of the area, to create a more pedestrian-friendly public realm as part of the centre
- Support new, suitably located off-street parking
- Improved directional signage; and
- Safeguard existing coach parking provision and support solutions to augment provision in appropriate locations to address unmet need.

The Parking Policy will be reviewed in 2020.

5.6 Quality of Life

5.6.1 One of the expected key challenges for the Local Plan will be to deliver a change necessary to raise the quality of life for Thanet's less advantaged citizens, whilst maintaining the quality of life for everyone. Thanet's historically deprived communities are found in the wards of Cliftonville West, Central Margate, Newington and Eastcliff. Alongside other programmes and initiatives, transport can go some way to address these challenges by increasing accessibility to public amenities and connectivity from some of Thanet's more deprived or rural areas.

5.6.2 To encourage walking and cycling generally improves overall health and fitness levels, improves air quality and helps to reduce the number of cars on the network, thus reducing congestion and saving money for the individual. Creating active street frontages, with more people walking and cycling, also reduces crime levels and can act as a catalyst for more people to become active.

5.6.3 The quality, safety and convenience of access by foot, bicycle and public transport are all key factors in encouraging people to select alternative modes to the private car.

5.7 Thanet Parkway Rail Station

5.7.1 The County Council's Transport Delivery plan identifies key opportunities and challenges to be addressed to deliver long-lasting regeneration and economic growth in the County. It recognises that many of Thanet's existing rail stations are difficult to reach by sustainable transport and offer limited car parking opportunities. This causes some commuters to travel significantly longer distances by car to access stations with better parking facilities.

5.7.2 The project's objective is to support growth at Manston, Business Parks around Westwood and Discovery Park.

5.7.3 The following outcomes are expected from the delivery of the station:

- Increased inward investment in Thanet and Dover.
- Thriving Enterprise Zone and surrounding Business Parks.
- Greater employment opportunities for Thanet and Dover residents.
- Access to high speed rail services across district.

5.7.4 The Parkway station will consist of the following elements which are subject to discussions with Network Rail and Local Train Operating Company.

- Two station platforms with disabled access.
- Disabled access ramps/lifts with footbridge.
- Ticket vending machine, waiting area and journey information point.
- CCTV and passenger help points
- Car Park and associated facilities with disabled access to platform.
- Drop off/ pick up point for buses, taxis and cars.
- Pedestrian and Cycle access

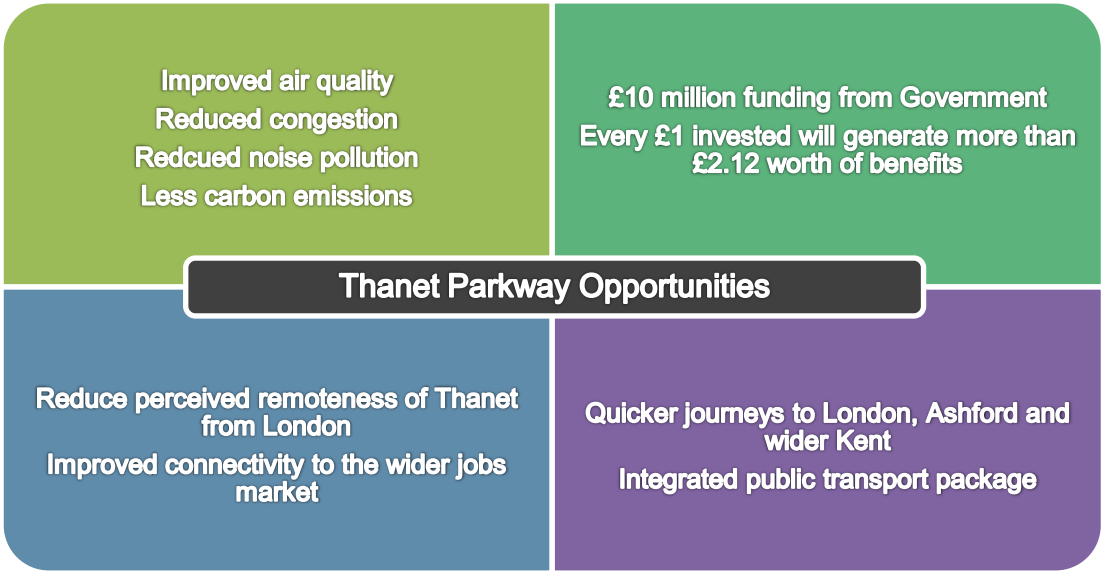

Improved air quality
Reduced congestion
Redcued noise pollution
Less carbon emissions
£10 million funding from Government
Every £1 invested will generate more than £2.12 worth of benefits
Thanet Parkway Opportunities
Reduce perceived remoteness of Thanet from London
Improved connectivity to the wider jobs market
Quicker journeys to London, Ashford and wider Kent
Integrated public transport package

Figure 11 - Thanet Parkway Headline Opportunities

5.7.5 Alongside parallel Journey Time Improvement Scheme (JTI) which increases line speeds between Ashford International and Ramsgate stations, it is anticipated that journey times from London to the Thanet Parkway would reduce to 1 hour, providing a significant boost to tourism, and regeneration of the area and enhancing access to private sector employment at Ashford and Ebbsfleet.

5.7.6 There may also be potential air quality benefits for the St.Lawrence area resulting from this proposal.

Figure 12 - An artist's impression of Thanet Parkway

6 Traffic Challenges

6.1.1 When compared to other areas of the county, existing traffic flows within Thanet are reasonably catered for, however the road network generally lacks resilience to cope with future growth. There are a number of junctions that cause localised delays during peak hour demand. These junction delays will continue to be exacerbated if necessary improvements are not made.

6.1.2 A significant proportion of Thanet's housing growth is identified on land within or adjoining the main urban area, which in turn will add pressure to existing primary highway routes and junctions, which are already subject to extended delays and environmental impacts. An appraisal of the local highway network through stakeholder engagement and interrogation of junction performance has identified a number of congestions 'hotspots' within the district. The purpose of this strategy is to highlight these challenges and seek to manage growth within this specific context.

6.2 M2 / A2 / A299 - Brenley Corner

6.2.1 Brenley Corner lies outside Thanet at Junction 7 of the M2, where traffic splits between the A2 (for Canterbury, Dover and the Channel Tunnel) and the A299 into Thanet. The M2 and A2 are part of the Strategic Road Network (SRN) managed by Highways England (HE), who have identified potential future congestion issues at Brenley Corner.

6.2.2 Improvements at this junction must consider future growth in Thanet, as well as the travel implications arising from growth plans of other districts.

6.2.3 Thanet District Council, in cooperation with neighbouring district councils and Kent County Council, has prepared an assessment of the scale of planned development and transport principles to assist HE in identifying its potential impact on those parts of the SRN where capacity may be an issue.

Figure 13 - Brenley Corner

6.2.4 Due to the way in which the junction is arranged, it is anticipated that the impact of development within Thanet will potentially have a lower level of impact on the operation of the existing junction when compared to directly adjacent districts.

6.2.5 The strategic importance of ensuring that Thanet remains directly accessible from the SRN, for both commuting and leisure based trips makes continued liaison with Highways England and investigation of a long term solution for this junction a key consideration for the interests of Thanet District.

6.3 B2050 / B2190 - Spitfire Junction

6.3.1 The Spitfire Junction is a convergence of two distributor roads located in the middle of the district (the B2050 Manston Road and B2190 Spitfire Way). The B2190 is a very important local route with the A299, which is one of the primary arterial routes serving Thanet, for locally bound traffic to Margate, Broadstairs and Ramsgate.

Figure 14 - Spitfire Junction

6.3.2 This operates with two priority junctions adjoining the B2050, a major distributor road that links Birchington, Manston and Ramsgate. Lengthy queues form at peak times on the B2190 from the west and on the westbound approach of Manston Road. Several designs have been considered at this junction to seek to improve junction performance and safety, however the alignment of the carriageway of the B2050 and the availability of residual highway land currently present geometrical challenges to an alternative approach.

6.4 A28 / B2055 / B2051 - Marine Terrace / Marine Parade (Margate Seafront)

6.4.1 Margate seafront is the final connection point of the A28 primary highway corridor and is the end point for one of the two principal routes into the Thanet area. The clock tower junction has been subject to alternative traffic schemes in the past, which has generated mixed results. Given the nature of Margate as a popular tourist destination, there is a clear requirement to accommodate pedestrian movement whilst managing considerable traffic flow.

Figure 15 - A28 / B2055 / B2051 Marine Terrace / Marine Parade

6.4.2 At present, the numerous pedestrian crossing points located on the seafront create journey time delay to motorists due to the popularity of the beach and seafront facilities (particularly during the busy summer tourist season) create a need for these crossing points to remain operational. Network reliability also has an impact on the punctuality of bus services.

6.5 A256 / A255 - Dane Court Roundabout

6.5.1 This roundabout junction serves as a central convergence point for distributor routes to Westwood, Margate, Broadstairs and St Peter's. It suffers from long queue lengths at peak times but is constrained by frontage development and could not be significantly improved without utilising land to the west of the junction. Recent traffic surveys suggest that the predominant flows on this roundabout take place between the A256 & Vicarage Street, which in turn impacts on the ability for traffic on the A255 to 'gap seek', leading to extended queuing within the A255 Dane Court Road.

Figure 16 - A256 / A255 Dane Court Roundabout

6.5.2 A possible method of better managing queues at this junction would be to introduce signal control or provision of a larger roundabout with increased capacity. However, these solutions would require the use of third party land.

6.6 B2052 - Coffin House Corner

6.6.1 This junction is located at the intersection between four important local routes and as such is now one of the busiest junctions in the district.

6.6.2 It forms part of the entry to and exit from the Tivoli one way system and is operating as a traffic signal controlled junction. The presence of popular primary schools within close proximity of this junction have a significant impact on its operation during peak hours, both in terms of on street parking and general traffic queuing. This also creates extended delay at the Manston Road/Shottendane Road junction, which is a well-used local route and serves the local Waste and Recycling Centre and Thanet Cemetery & Crematorium.

6.7 Westwood Cross

6.7.1 Westwood continues to be a centre of development activity in Thanet. The now well established Westwood Cross town centre, which has extensive retail and leisure facilities has been highly successful in stemming leakage of retail spend from the district and attracts visitors from beyond Thanet.

6.7.2 A phased development to deliver over 1,000 new homes is under construction on land fronting Haine Road and Nash Road. New Haine Road opened in November 2008 providing access to further land allocated for development.

6.7.3 Westwood is comprised of different land parcels; however these are separated by the Primary Road Network, thus creating a barrier to walking and cycling between retail outlets. Ongoing development and subsequent congestion around the town centre, (particularly at weekends), remains a challenge, however recent improvements to the road network have provided considerable benefit, with better route choice to spread traffic demand.

6.7.4 The Westwood Transport Plan was endorsed by the Joint Transportation Board (JTB) in 2010. This plan includes new roads / improved junctions, alongside widening of the existing arterial roads in the Westwood area, to provide alternative routes and disperse traffic more efficiently within the local area.

6.8 A254 / B2052 Victoria Traffic Signal Junction

6.8.1 Known locally as the Victoria Traffic Lights – This junction consists of a busy and complex five way junction linking College Road, A254 Ramsgate Road and Beatrice Road. The junction is located close to local primary schools, which in turn create further constraints in and around the College Road corridor during peak hours.

6.8.2 Recent traffic surveys reveal a total of 27,500 vehicles travel through this junction between 7am and 7pm on a typical weekday. It is a key junction within the A254 corridor and any reduction in the level of service at this junction can impact on the wider urban areas of Margate and beyond.

Figure 17 – Victoria Traffic Signals

6.8.3 The junction has been subject to phase and stage changes in order to manage journey times and safety. In terms of air quality, College Road was previously identified as an area approaching the health objective for nitrogen dioxide. However, since the recent junction improvements at Victoria Traffic Signals, levels have reduced significantly.

6.8.4 Recent junction improvements to this junction are as follows:

- An altered the pattern of the signals to optimise traffic flow.
- Introduction of MOVA, a system that can adjust the timing of the lights depending on levels of traffic on the different approach roads.
- Installation of 'smart' traffic signal control equipment to provide a level of bus priority within the timing of the signals.
- Provision of a signal controlled pedestrian crossing on College Road (east) to improve safety and amenity for those travelling by foot.

6.8.5 Since the introduction of the new improvements there has been a reduction in queue lengths and early indications suggest that safety at the junction has been improved. Despite these improvements, the junction continues to experience congestion during network peak times.

6.9 A28 / Birchington Square

6.9.1 This junction is located at the end of Station Road and forms part of the A28 Canterbury Road, which is the principal road corridor leading to Margate. Throughout much of the day, Birchington Square operates acceptably, however it is subject to long delays during peak periods. This issue is compounded during hot summer months with increased visitor traffic entering and leaving Thanet. Air quality has exceeded health objectives for nitrogen dioxide here since 2005.

6.9.2 The junction operates as a mini roundabout and is constrained by historic frontage development and local features. A priority junction is located at Park Lane to the south of the mini roundabout, which provides access to the local Primary School, Acol Village and local rural road network.

6.9.3 A visual appraisal of the junction has identified that the cause of the congestion often relates to the positions of existing bus stops in the square and operation of the pedestrian crossing at the end of Park Lane combined with right turning traffic movements, which impede the free flow of traffic in the locality. When buses are stationary at the same time on both the eastbound and west bound stops, the gap between them impedes the free flow of larger vehicles.

6.9.4 Right turning traffic into Park Lane often cause queues at peak times partly due to the 'single way working' system which is in place, which only allows a very limited number of vehicles to queue on Park Lane. Those vehicles at the junction have difficulty emerging onto the A28 Park Lane which can lead to instances of gridlock. This often leads to queuing back along the A28, the result of which encourages traffic to seek alternative routes though the residential areas to the north and south of the A28.

6.9.5 Proposed growth at Birchington and Westgate will impact on Birchington Square and as such developers would be required to mitigate the impacts of their development. In order to better manage journey times and air quality issues within the locality a more comprehensive solution to traffic accessibility needs to be explored which would allow the A28 to operate with minimal interruption.

6.10 A255 St Lawrence Junctions

6.10.1 The St Lawrence area in Ramsgate suffers from extended peak hour queuing at its junctions of A255 Nethercourt Hill/Newington Road/High Street St Lawrence and Newington Road/Manston Road. Both junctions impact on each other due to the sheer volume of traffic and the blocking back that occurs between them. The junction with the High Street is difficult to address by way of increased road space due to the proximity of listed buildings within the immediate vicinity.

6.10.2 Air quality issues are prevalent in this location. The presence of a number of primary schools in close proximity to this junction exacerbate the situation, as pedestrian crossings further impact on the free flow of traffic. Unreliable journey times on the A256 Haine Road corridor currently contribute to local route choice in relation to Broadstairs; as such an improvement to journey times on the Haine corridor could be an appropriate method of managing traffic flow in this location.

6.11 A256 Haine Road / Westwood Road Corridor

6.11.1 The A256 Haine Road is the principal road corridor for vehicles entering and leaving Thanet from the south. The popularity of Westwood Cross as a shopping destination results in a significant number of motorised journeys during morning and evening peak hours, and also at weekends.

6.11.2 Haine Road is an important commuter route, used by traffic seeking to access other primary routes. The corridor is generally accessed by via roundabout junctions, however Lord of the Manor operates as a complex signal controlled junction. Lord of the Manor is subject to extended queues during peak hours, particularly on its Northern and eastern arms. An increase in activity at Ramsgate Port back to levels formally realised at full operation would exacerbate this existing traffic situation.

6.11.3 The junction of Manston Road and Haine Road is currently formed of a compact roundabout and priority junction arrangement. Peak hour journey times on the Haine Road corridor are generally impacted by a combination of both link demand and junction delay. Recently consented development at Manston Green, seeks to provide further junction capacity in this location through the provision of a new spine road and greater separation between junctions. Further mitigation will need to be introduced within the locality to accommodate additional traffic growth.

7 Air Quality

7.1.1 Poor air quality has an impact on people's health. It mainly affects the respiratory and inflammatory systems, but can also lead to more serious conditions such as heart disease and cancer. Thanet has the highest PM2.5 (fine particles) mortality rate in Kent, not because air quality is worse than other areas of Kent, but because Thanet has a more vulnerable population. Transport is widely recognised as one of the biggest causes of Nitrogen Dioxide (NO2) pollution.

7.1.2 The urban wide Air Quality Management Area (AQMA) in the district requires management through the Air Quality Action Plan (AQAP). The two junctions that have exceeded recommended NO_2 levels have done so due to transport emissions. Therefore this Strategy can support and take action to improve air quality not only in these areas but throughout the district. These include:

- Improving traffic flow by looking at junction and signal configuration.
- Ensuring freight traffic uses the most suitable routes.
- Increasing use of public transport and more sustainable modes, including car sharing, cycling and walking.
- Considering air quality in the Development Planning process in terms of site location, travel planning and obtaining contributions for example towards public transport and supporting low emission vehicles.

7.1.3 Fine particles and NO2 continue to be monitored across Thanet at over 30 key locations. Two areas have been identified as exceeding the annual objective for NO2: The Square, Birchington and High Street St Lawrence.

7.1.4 The junction of Boundary Road/Hereson Road Ramsgate is fluctuating around the NO2 objective and another location close to the objective is the junction at College Road/Ramsgate Road, Margate (known locally as Victoria traffic lights). However, since the junction improvements there has been a significant reduction in pollution levels. All exceedance areas are due to traffic related pollutants in congested locations near housing. In 2011 an urban wide AQMA was declared to enable a strategic approach to be taken in tackling the problem.

7.1.5 The AQAP was amended in 2016 to include an Air Quality Technical Planning Guidance. The Guidance requires all major development to undertake an Emissions Mitigation Assessment to determine the appropriate level of mitigation required from a development. A transport emissions calculation produces an exposure cost value to be spent on mitigation measures.

7.1.6 An emissions mitigation calculation inputs the additional number of trips generated by the development into the latest DEFRA Emissions Factor Toolkit which calculates the amount of transport related pollutant emissions a development is likely to produce. The output is then multiplied by the Interdepartmental Group on Costs and Benefits damage costs for the key pollutants; NO2 and Particulates. Finally the emissions total is then multiplied by 5 to provide a 5 year exposure cost value which is the amount (value) of mitigation that is expected to be spent on measures to mitigate those impacts. This value is used for costing the required emissions mitigation for the development.

7.1.7 The Air Quality Technical Planning Guidance seeks to increase the number of electric charging points within or close to the urban AQMA. Electric Vehicles offer the benefits of zero emissions at the point of use but the network of charging points is not yet widespread.

7.1.8 Recent central government announcements have provided a commitment to phase out Petrol and Diesel based on UK roads over the coming decades, therefore it is now even more important that the necessary infrastructure to facilitate this is introduced at the earliest possible opportunity.

7.1.9 To reflect this evolving position, it is proposed that all development within the urban wide AQMA will be required to implement EV on the following basis:

- Residential (where there are 10 or more units): 1 Electric Vehicle charging point per dwelling with dedicated parking or 1 charging point per 10 spaces (unallocated parking)

- Commercial/Retail/Industrial: 10% of parking spaces to be provided with Electric Vehicle charge points which may be phased with 5% initial provision and the remainder at an agreed trigger level

8 Planned Development

8.1.1 The Thanet Local Plan will guide investment and planning decisions by identifying the scale and location of development to meet requirements over the period to 2031.

8.1.2 Traffic modelling carried out to inform this Strategy also serves to inform options for the allocation of development. This Strategy will inform policies for the Local Plan seeking to address existing challenges and identify the key transport infrastructure required to support the planned development.

8.1.3 The Thanet Local Plan sets a target of 17,140 dwellings to be provided over the period to 2031. Alongside this, some 5,000 jobs are expected to be created in different sectors across the district. Development includes strategic sites at Birchington, Westgate, Westwood, Ramsgate and Margate, which can assist in the provision of Transport Infrastructure. Jobs growth and economic development is expected to be focused on the town centres and existing employment sites, therefore it is expected that existing patterns of trip distribution will apply to the majority of new residential development.

8.2 Key Development Sites

8.2.1 A recent study was undertaken by Thanet District Council to consider the required level of development for the district to meet future growth needs; these are known as Objectively Assessed Needs (OAN). In order to meet the OAN, the District Council has identified a number of key strategic sites for development along with a number of smaller sites and windfall assumptions.

8.2.2 The strategic allocations and housing delivery projections across the entire Local Plan are outlined below and shown geographically in **Figure 18**.

Period	2011-16	2016-21	2021-26	2026-31	Total
Additional Homes	1,555	4,500	5,500	5,585	17,140

Site	Housing Allocation (Dwellings)
Westwood	1450
Birchington on Sea	1600
Westgate on Sea	2000
Land at Manston Court Road/Haine Road	1200
Manston Green	700
Hartsdown/Shottendane	550

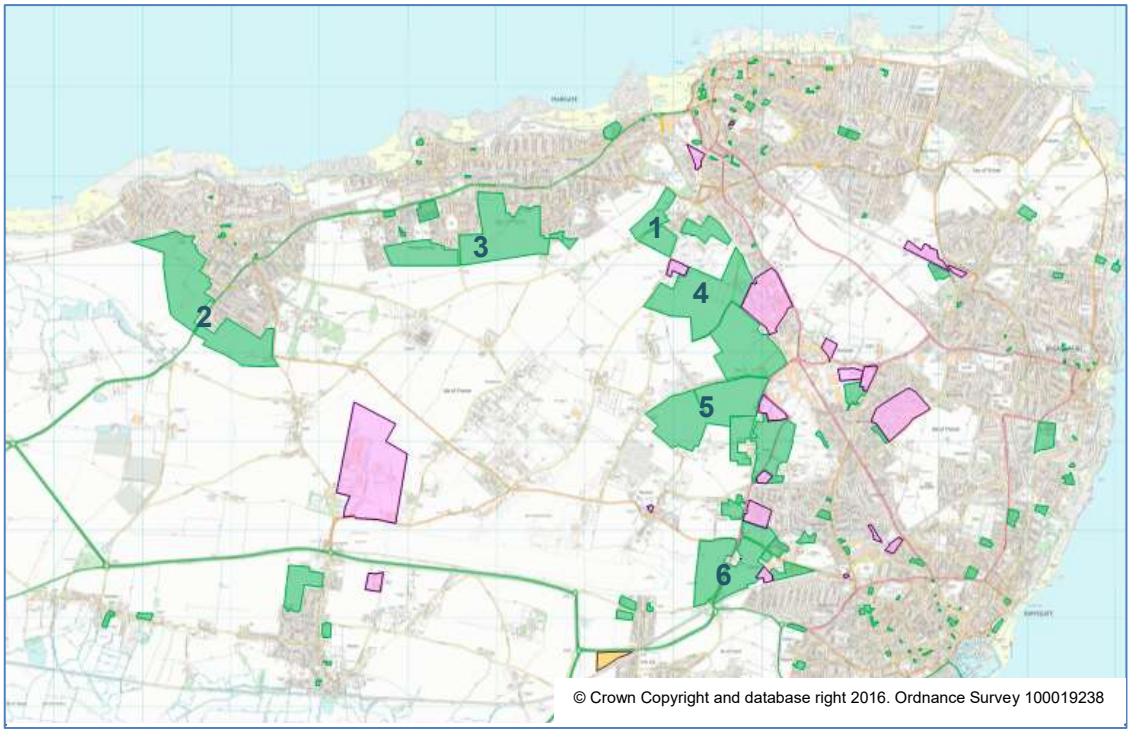


Figure 18 - Key Strategic Development Sites

(1) Margate

8.2.3 This site is located to the south of Margate. It comprises of two land parcels to the north and south of Shottendane Road. The site provides the opportunity to provide new highway links between Hartsdown Road and Manston Road, which allows traffic to travel to and from Westwood and the Waste and Recycling Centre without negotiating Coffin House Corner or the existing Shottendane Road/Manston Road junctions.

(2) Birchington on Sea

8.2.4 An open site located to the south and west of Birchington settlement to both sides of the A28 Road corridor. This site provides an opportunity to improve highway access to Minnis Bay and Quex Park, providing a level of managed growth in relation to the A28 Birchington Square.

(3) Westgate on Sea

8.2.5 A residential development located to the south of existing settlements in Westgate and Garlinge on both sides of Minster Road. The site provides an opportunity for sustainable development and can deliver contributions towards wider improvements within Shottendane Road. A new highway link between Shottendane Road and the A28 could also be delivered (subject to land).

(4) Westwood

8.2.6 Situated alongside the existing Nash Road corridor, this site provides a natural extension to consented development at Land North of Haine Road. There is opportunity to upgrade the existing Nash Road corridor, which in turn will provide a tangible alternative to the congested A254 Road corridor for Margate to Westwood bound trips. There is further potential to better link Westwood Industrial Estate to the wider highway network and enhance pedestrian and cycle access.

(5) Land at Manton Court Road/Haine Road

8.2.7 A mixed use development located to the south of Manston Court Road and the east of the existing Westwood Cross shopping centre. This site provides an opportunity to deliver part of/a proportionate contribution towards a new primary highway link between the B2050 and the A256.

(6) Manston Green

8.2.8 A development of 750 dwellings located on the A256 between Cliffsend and Westwood. Manston Green facilitates an opportunity to improve the existing A256 Haine Road corridor by providing enhanced junction arrangements. An improvement strategy for bus connectivity will also be necessary.

9 The Action Plan

9.1 Addressing Challenges

9.1.1 The Thanet Local Plan identifies a need for 17,140 new homes and the creation of 5000 new jobs. In order to provide managed growth and affordable transport solutions, local plan allocations have been specifically considered in the context of the existing highway conditions. To support identified growth a number of objectives are proposed.

General Objectives

- Minimise the need to travel or use private cars to access services, employment and amenities.
- Inform the Local Plan in identifying and delivering sustainable development options.
- Focus development at sustainable locations to reduce the need to use private cars.
- Tackle congestion and reduce the impacts of transport pollution on air quality.
- More direct walking and cycling routes to reduce isolation and potential noise and pollution and improve public health and fitness in general.
- Efficient, convenient and safe public transport system alongside expansion of larger scale infrastructure.
- Promote the internalisation of trips and reducing the need to travel as well as measures to support modal shift away from the car.
- Enhanced integration of HS1 with the wider public transport network.
- A further decrease in rail journey time between Ramsgate and London.
- Enhance bus services to both built up and more rural areas.
- Ensure that car based journeys are as free as possible of congestion and direct as possible to maintain reliability of journey time

Place-Specific Objectives

- Improved traffic circulation and route choice around Westwood Cross.
- Delivery of further pedestrian links around Westwood Cross.
- Manage existing congestion hotspots along A28, A254 and A256 corridors.
- Improved accessibility for pedestrians, cyclists and public transport along Margate seafront.
- A car parking strategy for Broadstairs, Ramsgate and Margate town centres in order to maintain sufficient, quality and well located provision reflecting the needs of their business and residential communities.
- Further accommodation of visitor parking at Broadstairs during peak season.

9.2 Improving The Local Highway Network

9.2.1 Where possible proposed allocations are located in such a way that off-site highway infrastructure works are limited and on site infrastructure solutions are achievable. This enhances opportunities for provision of new highway infrastructure in a fair and realistic way.

9.2.2 Local peak hour traffic congestion is present at a number of junctions within the district and this is often due to the way that traffic is signed and moves around Thanet within the principal distributor routes. Thanet has other well used distributor routes forming an 'inner road circuit'; these are typically B and C classification routes that are of historic alignment and geometry. A number of junctions do not meet modern transport needs in terms of safety, capacity and amenity.

9.2.3 Whilst these alternative routes have the theoretical link capacity ability to carry more traffic (subject to improvement), they do not currently represent a viable alternative for many trips on the local highway network. This strategy seeks to address this specific issue by improving existing links to provide enhanced route choice for vehicle, walking and cycling journeys. This is referred to as the Inner Circuit Route Improvement Strategy (ICRIS).

9.2.4 This ICRIS will provide direct access to and from the A28 and the A299 major road network and local destinations such as Westwood, without traversing built up areas or causing additional congestion within the network. It will also reduce pressure and free up capacity on the existing Primary Road Network, particularly on the A28 (Birchington through to Margate) and the A254 corridor to and from Westwood. Improved highway infrastructure also provides the opportunity to review existing bus services to better serve rural communities.

9.3 The Inner Circuit Route Improvement Strategy (ICRIS)

9.3.1 The ICRIS encompasses a number of key highway interventions, which will be delivered in conjunction with the relevant strategic allocations. It is anticipated that infrastructure will also include appropriate off-road cycle and footway facilities where necessary, thus improving sustainable transport links within the district. The ICRIS links a number of key destinations within the district and integrates proposed development sites with existing settlements.

Birchington

9.3.2 The proposed land allocations at Birchington will incorporate new internal road connections from the A28. This strategy proposes a new junction at the top of Brooksend Hill in advance of the built up Birchington settlement. A new road to the north will be created through the proposed development to connect the A28 to Minnis Road. This will serve the whole of the Minnis, Grenham and Epple Bay areas, and provides the opportunity for traffic to avoid the busiest sections of the A28 within Birchington (particularly The Square) when accessing these settlement areas.

9.3.3 The new highway links will be constructed to Local Distributor standard, thus facilitating future bus access and enhancing opportunities to serve the site and link bus services to Birchington Station. New routes will incorporate good quality shared cycle and footway facilities.

9.3.4 In addition to the above, a new highway link would be created to the south east from the proposed junction on the A28 to connect to the B2050 at its junction with Acol Hill. It is anticipated that much of the new road would be through the new development area. Developers will be expected to fund the entire link to a point where it meets Shottendane Road.

9.3.5 This link would provide direct access from the Primary Road Network to Quex Estate (a popular mixed use leisure, retail and event destination) and would discourage existing rat running which is prevalent through Acol Village (via Crispe Road) from traffic currently avoiding queues on Brooksend Hill.

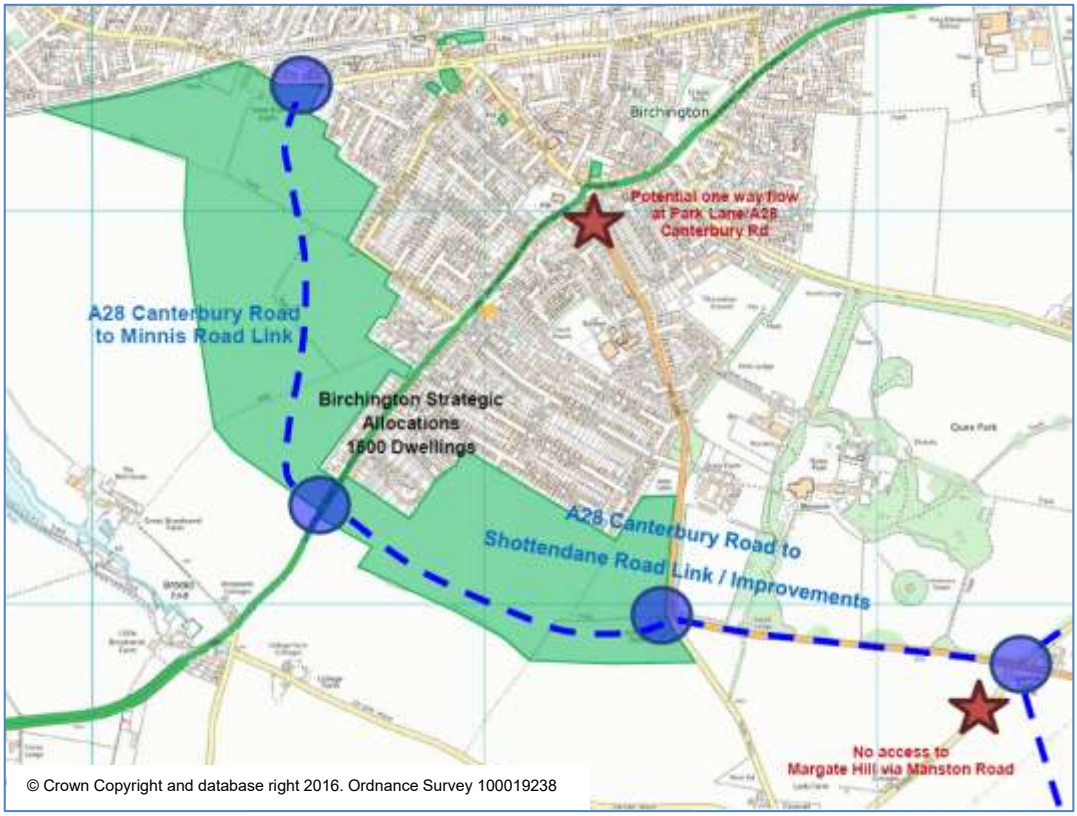

Birchington
Potential one way flow at Park Lane/A28 Canterbury Rd
A28 Canterbury Road to Minnis Road Link
Birchington Strategic Allocations 1600 Dwellings
A28 Canterbury Road to Shottendane Road Link / Improvements
No access to Margate Hill via Manston Road
© Crown Copyright and database right 2016. Ordnance Survey 100019238

Figure 19 - A28 to Minnis Road & Manston Road New Road Links

9.3.6 These new highway links would divert a considerable amount of Minnis Bay and Quex bound traffic away from Birchington Square, an identified AQMA, and manage traffic impacts along the A28.

9.3.7 With the above highway routes secured, it may then be possible to provide additional benefits to the local road network, such as removing the mini roundabout in The Square and giving direct priority to the A28 corridor and addressing the way Station Road is served by traffic with options to improve pedestrian accessibility. This also facilitates a potential opportunity to introduce a one-way section of highway at the top of Park Lane, which would eliminate the impediment to traffic flow caused by vehicles waiting to turn right into and out of Park Lane on the A28.

9.3.8 The B2050 south of Quex Park would be widened and a new roundabout junction provided at Shottendane Road/Margate Hill, which accommodates a new link to Columbus Avenue on Manston Business Park.

9.3.9 The Columbus Avenue link improvement would enable traffic to access the A299 / A256 (Hengist Way and Richborough Way) from Thanet's northern coastal towns such as Birchington, Westgate, Garlinge and Westbrook, by-passing Acol village. Acol is currently regularly used by through traffic and its narrow roads, poor alignment and lack of pedestrian footways are a constant concern for residents of the village.

Westgate / Margate

9.3.10 The development allocation at Westgate and Garlinge will impact on the A28 route corridor with significant junction improvements necessary along the entire A28 route to offset additional trips. A package of improvements on Shottendane Road would be required, to include widening and junction improvements with Park Road, Minster Road and High Street, Garlinge will give an alternative distribution option for trips generated by the development. It would also be necessary to consider a reduction in the current speed limit to 40mph where appropriate.

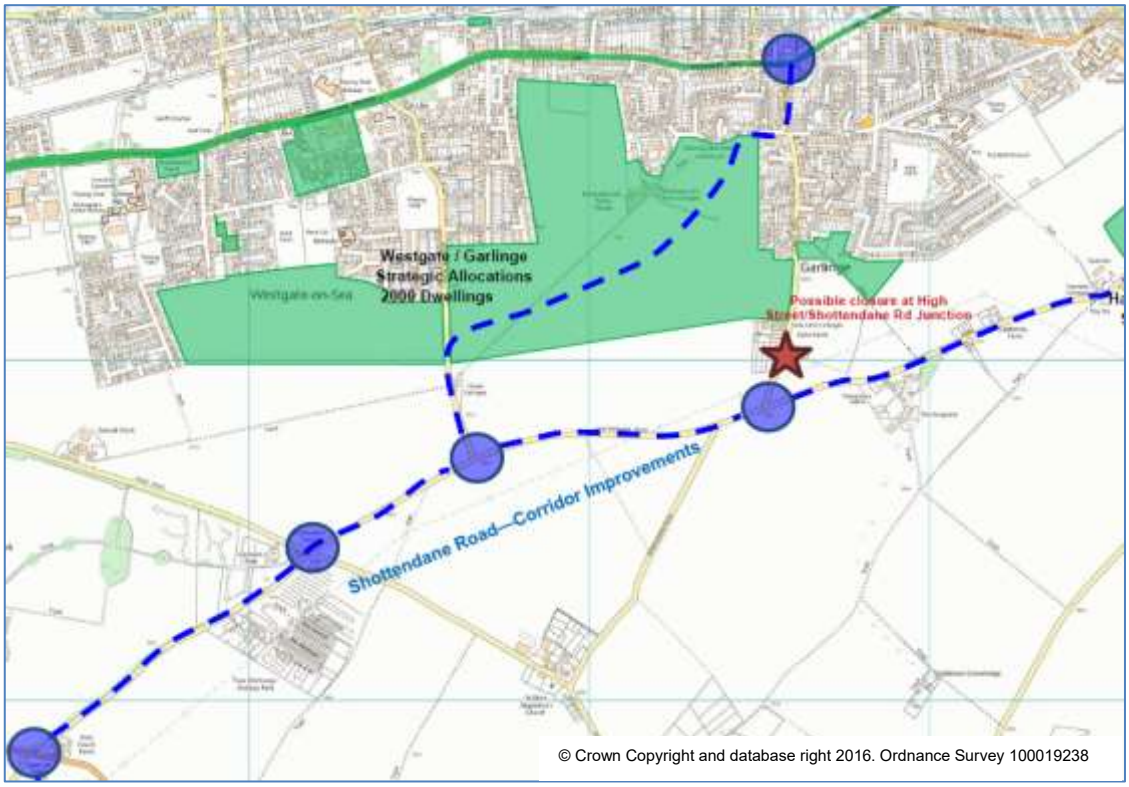

Westgate / Garlinge
Strategic Allocations
2000 Dwellings
Possible closure at High Street/Shottendane Rd Junction
Shottendane Road—Corridor Improvements
© Crown Copyright and database right 2016. Ordnance Survey 100019238

Figure 20 - Shottendane Road Corridor Improvements

9.3.11 It is widely recognised that Westwood is a primary attractor for trips in Thanet and Shottendane Road would represent a shorter journey to reach Westwood than the currently used A28 for trips from the north of the District.

9.3.12 Shottendane Road currently terminates at the Coffin House Corner junction, which is already subject to increased journey times during network peaks. In order to mitigate significant further impact, it is proposed to provide a new link between Shottendane Road and Manston Road through new development land adjacent to Firbank Gardens.

9.3.13 It is then possible for Shottendane Road to become a cul-de-sac at the junction with Manston Road further east, consolidating efficient reconfiguration of this junction to achieve optimal capacity and improve highway safety for both vehicles and pedestrians.

9.3.14 This new connection is beneficial as a new roundabout junction is also proposed on Manston Road to support the allocation of land behind St Gregory's School and Salmestone Grange. This land allocation will provide a new primary road link through to Nash Road, which in turn will allow Nash Road to be closed at the Coffin House Corner junction (described in more detail under Margate Junctions).

9.3.15 This connection would allow traffic to access Westwood without being required to travel through Coffin House Corner, Victoria Traffic Lights or use the A254 corridor. This also has the potential to discourage rat running through existing rural lanes such as Flete Road and Vincent Road by providing enhanced links to Westwood.

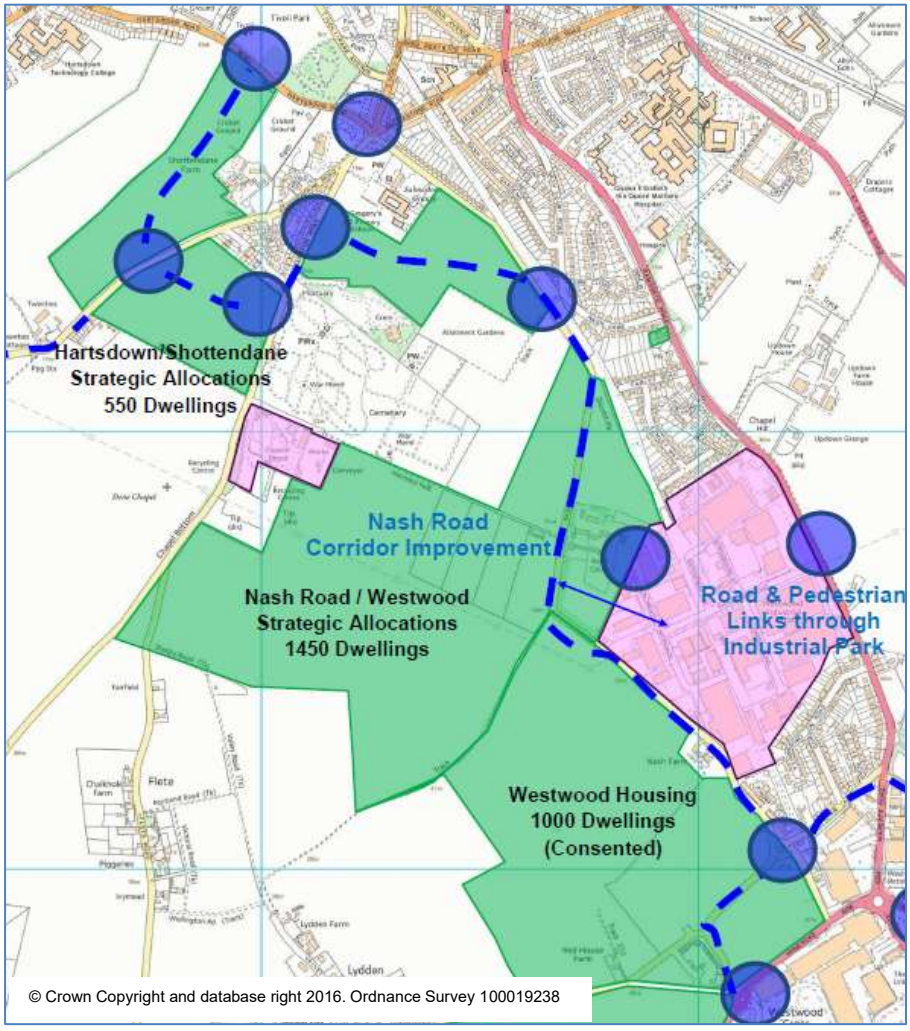


Figure 21 - Links between Shottendane Rd, Manston Rd, Nash Rd & Westwood

9.3.16 Land is also allocated along Nash Road (1450 dwellings) which is perfectly placed to accommodate the necessary widening of Nash Road to the new junction with Star Lane and Star Lane Link. Whilst some traffic could be diverted through the new residential development on Land North of Haine Road (1020 new homes), this development has not been historically planned with this purpose in mind. Therefore it is considered more appropriate to deliver widening along the existing alignment.

Broadstairs / Manston

9.3.17 The ICRIS continues along the newly constructed Star Lane Link and Haine Road to the Toby Carvery roundabout on the A256 corridor. Proposed development on Land Adjacent to Manston Court Road will be required to accommodate a new local distributor link road through the site, facilitating a new connection onto Manston Court Road. The section of Manston Court Road east of Valley Road could then be restricted. Further measures would be introduced to discourage the use of Vincent Road/Flete Road.

9.3.18 The remainder of Manston Court Road (between Valley Road and the B2050 Manston Road) will require significant improvements to widen the carriageway to form a local distributor road. It is anticipated that a new highway link would be created on the existing Northern Grassland within the airport site. The nature and route of this link will depend on the final proposals for this site.

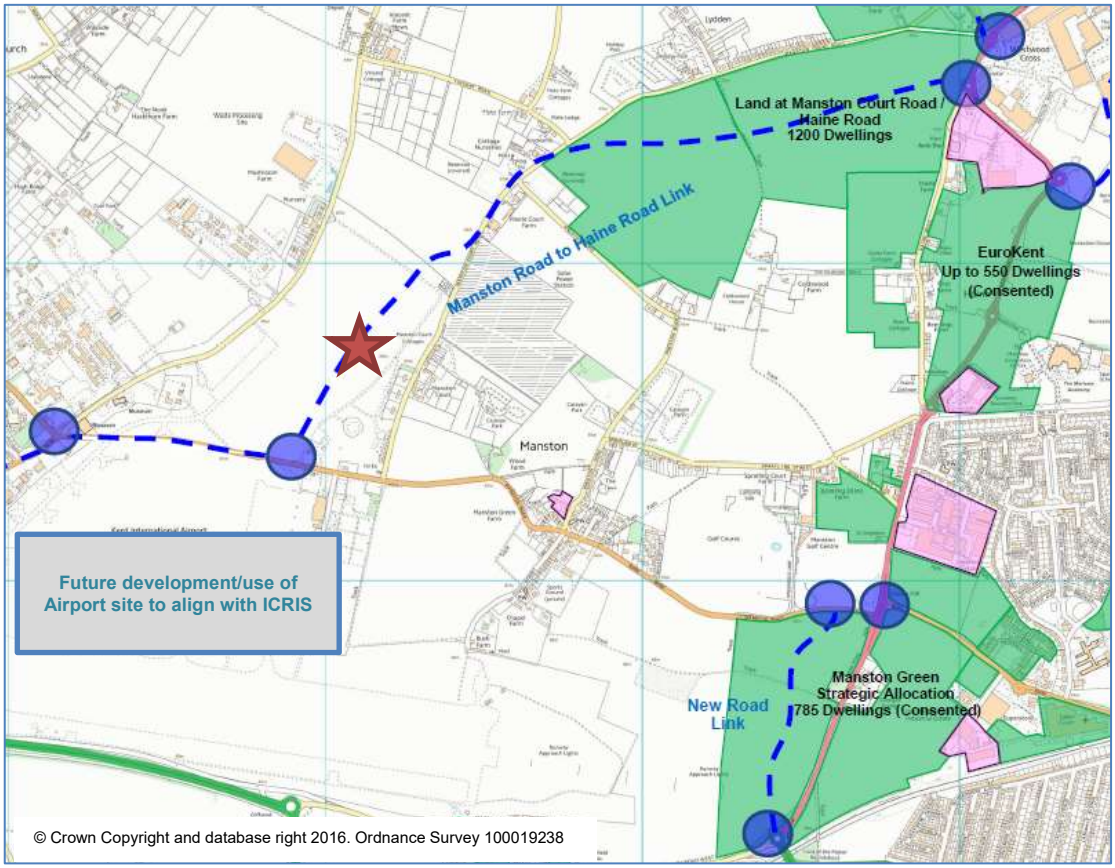

Land at Manston Court Road / Haine Road
1200 Dwellings
Manston Road to Haine Road Link
EuroKent
Up to 550 Dwellings
(Consented)
Manston
Future development/use of Airport site to align with ICRIS
Manston Green
Strategic Allocation
785 Dwellings (Consented)
New Road Link
© Crown Copyright and database right 2016. Ordnance Survey 100019238

Figure 22 - Manston to Haine Road Links

9.3.19 It will be necessary for any activity or development at the airport site and Land Adjacent to Manston Court Road to make significant improvements (or financial contributions if deemed appropriate) towards the road network in the locality. Such improvements would include a new direct highway link to and from Westwood and new/improved links to the existing dual carriageway on Spitfire Way fronting Manston Business Park

9.3.20 Spitfire Junction will need to be reconfigured to address existing capacity and safety concerns and access to this junction from the A299 will need to be controlled or restricted to avoid excessive use of Manston Road for Margate-bound trips. In addition, a direct connection would be made across the site to connect A299 Canterbury Road West to Manston Court Road (once upgraded) by-passing the existing A256 approach through Haine. The extension of Columbus Avenue to the B2050/Shottendane Road/Margate Hill junction would also be delivered (to by-pass Acol Village).

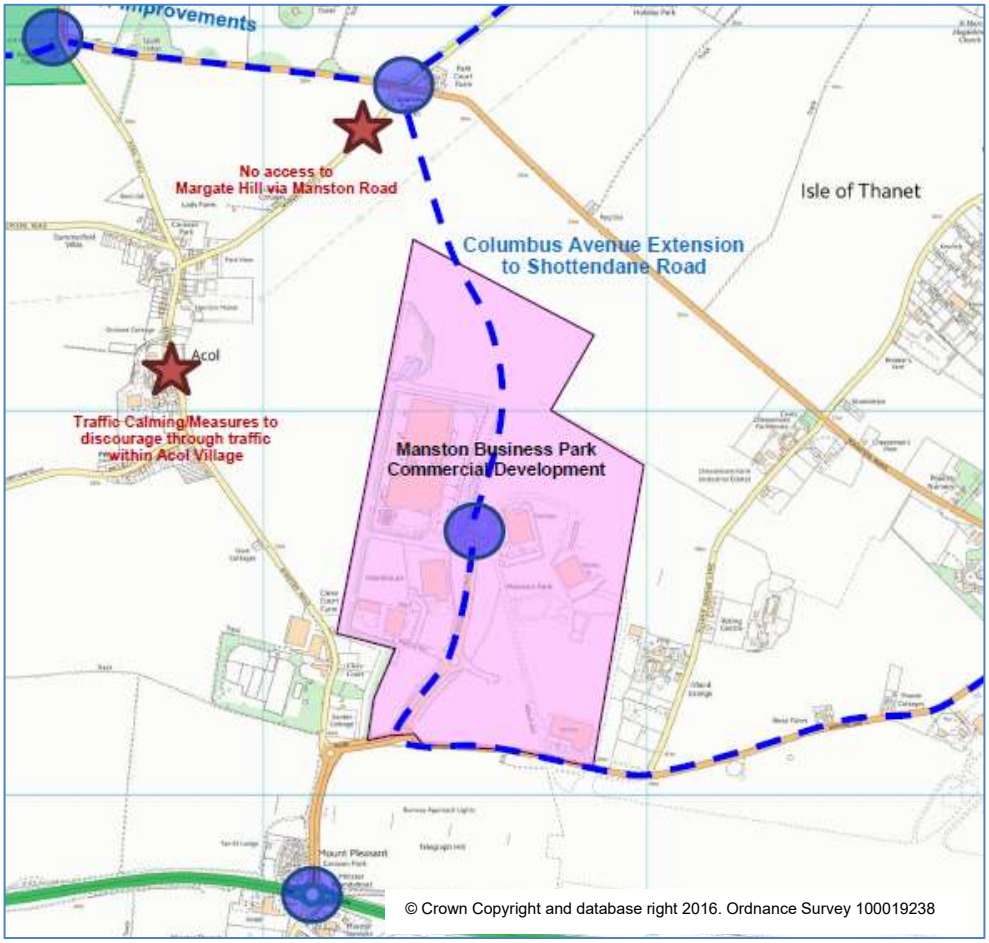


Figure 23 - Columbus Avenue Extension to Manston Road

9.4 Westwood Relief Strategy (WRS)

9.4.1 Opportunities have been sought for the economic development of Thanet, with Westwood being one of the key successes during the last decade. The growth of Westwood Town Centre, with the Westwood Cross Retail Development has led to increased traffic congestion at peak times. Until recently Westwood Roundabout has been identified as the worst pinch point, as the intersection point of roads between Ramsgate, Broadstairs and Ramsgate and at the heart of Westwood Town Centre. Despite recent improvements, this roundabout is still subject to extended delays at times of peak demand.

9.4.2 Congestion at Westwood causes journey time delays to trips to the coastal towns of Ramsgate, Margate and Broadstairs. Vehicles wanting to access/leave Thanet, via Broadstairs, either have to travel through Westwood to gain access to the major road network or take an indirect and circuitous route along the coastal roads. Many vehicles travelling between Ramsgate and Margate also need to travel through Westwood; as such this generates a large amount of through traffic at Westwood Roundabout.

9.4.3 In order to manage this issue KCC have developed a congestion relief strategy for Westwood area. This is outlined in **Figure 24**.

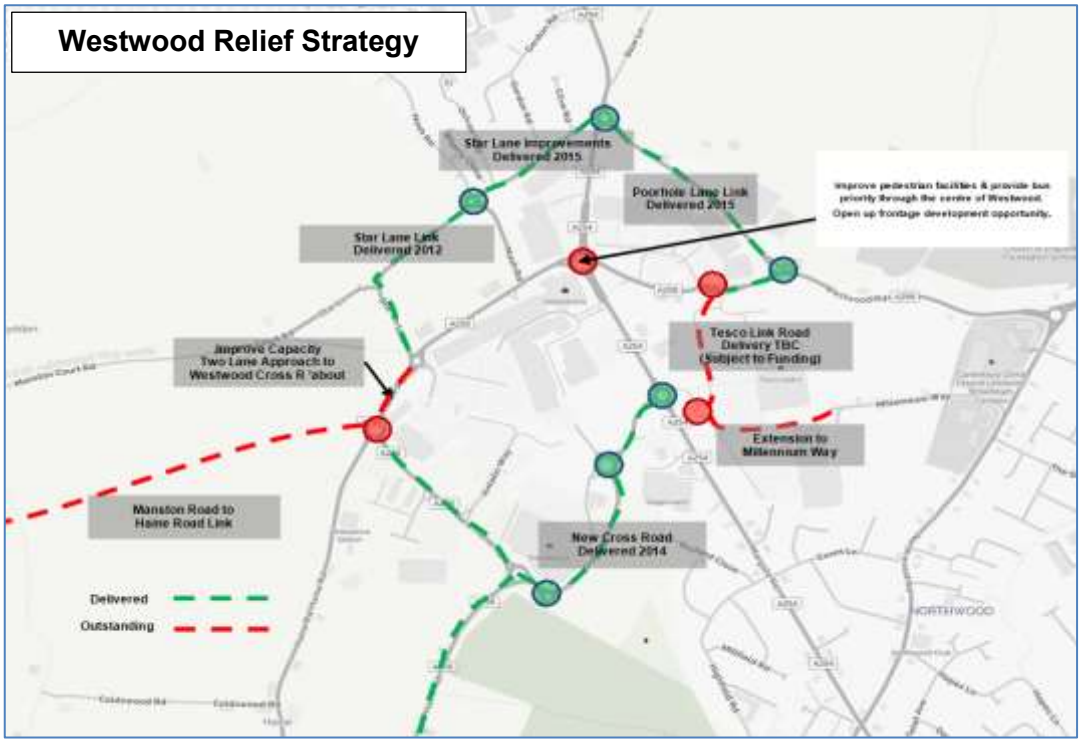

Westwood Relief Strategy
Star Lane Improvements Delivered 2015
Poorhole Lane Link Delivered 2015
Star Lane Link Delivered 2012
Improve pedestrian facilities & provide bus priority through the centre of Westwood. Open up frontage development opportunity.
Improve Capacity Two Lane Approach to Westwood Cross R'about
Tesco Link Road Delivery TBC (Subject to Funding)
Extension to Millennium Way
Manston Road to Haine Road Link
New Cross Road Delivered 2014
Delivered
Outstanding

Figure 24 - Overview of Westwood Relief Strategy

9.4.4 In 2013 KCC were successful in securing Pinch Point Funding from Central Government, which together with developer contributions was sufficient to address Phase 1 of the Westwood Strategy. This scheme comprised of the widening of Poorhole Lane and provision of new roundabout junctions at either end (A254 & A256).

9.4.5 This important link forms part of an overall strategy for the Westwood area which takes account of new roads recently constructed, existing roads altered and proposed roads which will in due course provide a complete single carriageway ring road or "orbital route" around the fringes of the Westwood area.

Completed Schemes

New Haine Road

A new road constructed by East Kent Opportunities LLP (a joint venture between KCC/TDC) and Rosefarm Estates – between the roundabout junction adjacent to the new Sainsbury's store and Haine Road.

Star Lane Link

New road link constructed by developers through the first phases of strategic housing development (Land North of Haine Road), connecting Haine Road with Nash Road / Star Lane.

Star Lane

New roundabout junction constructed at the Junction with Nash Road end by developers and the carriageway has been widened to accommodate lay-by parking to the north side for existing residents.

Poorhole Lane

New roundabout junctions at either end with carriageway widening to 7.3m and new footway/cycle ways either side.

New Cross Road

Roundabout on Margate Road, Ramsgate has been increased in size and a new distributor road constructed to link Margate Road (A254) to New Haine Road (A256) including bus stops and new footway/cycleway facilities.

Outstanding Schemes

A256 Westwood Road to A254 Margate Road Link

Upgraded and adopted by KCC to provide a new distributor route connecting Westwood Road and Margate Road. Alternative links explored if necessary.

A256 Westwood Road to A254 Margate Road Link – Millennium Way Extension

Provision of new road/footway and cycleway link between new link road and Millennium Way, providing and alternative route to Westwood Road Via Northwood Road.

A256 Haine Road to A254 Manston to Haine Link Road (addition to original WRS)

New road/footway and cycleway link between A299 and A256 Through prospective development sites. Providing an alternative access route avoiding the Haine Road Corridor.

Figure 25 - New Cross Road Link

9.5 The Future

9.5.1 With a new orbital route in place, improvements can be promoted at Westwood roundabout to accommodate more pedestrian and cycle movement honouring desire lines. This will encourage more sustainable access to the four retail quadrants that comprise the Westwood Town Centre. To keep the junction open at all times in order to maintain maximum accessibility of the area an approach similar to that implemented at "Oxford Circus" is currently under consideration. This would involve the removal of the existing roundabout and the introduction of traffic signals with a high level of pedestrian priority.

9.5.2 The junction would act to accommodate through traffic but the signals would be capable of prioritising pedestrian movement when required. A better pedestrian environment would also reduce current traffic flows generated by car-park hopping between the main retail quadrants.

9.5.3 In addition to the major road proposals to provide the "orbital link" a package of additional improvement measures are being sought to promote sustainable access opportunities into the Westwood area that can be funded via developer contributions. These include bus lanes on the approach to the Westwood roundabout junction along the A254 corridor and improved pedestrian and cycle connectivity with desire lines being acknowledged and accommodated.

9.6 Margate Junctions

9.6.1 A high level appraisal of the local road network and associated transport modelling has identified key congestion hotspots in the Margate area. Three major junctions were identified as being the worst affected and shown to be major constraints on the network at peak times.

The junctions are:

- **Coffin House Corner** – Hartsdown Road/Shottendane Road/Nash Road/ College Road/Tivoli Road.
- **Victoria Traffic Lights** – A254 Ramsgate Road/B2052 College Road/B2052 Beatrice Road
- **Margate Clock Tower** – Marine Gardens/Marine Terrace/Marine Drive.

Coffin House Corner

9.6.2 To reduce traffic impact the existing A254 Ramsgate Road corridor, an alternative route to Westwood should be explored. The most obvious solution would be to widen Nash Road throughout its length to provide all road users another route option between Margate and Westwood.

9.6.3 In its current form, the Coffin House Corner junction could not have sufficient capacity to accommodate the potential increase in traffic flows that would ensue from an improved Nash Road corridor. KCC are exploring the potential closure of Nash Road at its junction with Coffin House Corner and routing traffic around the back of Salmestone Grange and St Gregory's Primary School to a new junction onto Manston Road. This would enable the existing traffic signals to be optimised, allowing increased green time on given approaches, since one phase would disappear completely and the Shottendane Road and College Road phases could operate together. Such a proposal would also provide enhanced pedestrian access the school and the wider highway network.

9.6.4 The promotion of this alternative route to Westwood, Ramsgate and Broadstairs would have a very positive impact on other parts of the road network, including Victoria Traffic Lights and Westwood Roundabout, which are geometrically constrained. This would be achieved by providing better quality alternative routes to local destinations.

Victoria Traffic Signals

9.6.5 This junction is currently optimised in terms of a traffic signal control junction with very little scope to increase the capacity and the rate of flow thorough the junction, without considerable loss of surrounding buildings, which in turn would have a significant impact on the locality.

9.6.6 Alternative options are currently being explored including the reconfiguration of traffic flows within the area to create some relief to the junction. As outlined above, growth is more realistically manageable through the implementation of the Coffin House Corner junction and Nash Road improvements, which would provide more appropriate alternative route options for journeys towards Westwood, Ramsgate and Broadstairs.

9.6.7 There may be some merit in providing a more formal road link utilising Yoakley Square and Perkins Avenue. This route currently operates as a rat run but would be unsuitable in its current form for vehicles wanting to head towards Cliftonville. Should such an option be explored in more detail, there are also environmental and amenity considerations to balance.

Margate Clock Tower

9.6.8 The Clock Tower junction itself is highly constrained as it sits within an area of listed buildings and has tunnels below the paved pedestrian area fronting Marine Gardens which cannot be disturbed. It is necessary therefore to attempt to control the flow of traffic through the junction by re-routing a quantum of vehicular traffic away from the junction.

9.6.9 Improvements would need to be made including making the roundabout junction safer at the junction of Queens Avenue/Tivoli Road/Eaton Road/Grosvenor Place and Grosvenor Gardens. This junction has recently been improved by making Queens Avenue one-way and realigning the carriageway approach from Queens Avenue to the roundabout to improve visibility for vehicles exiting Tivoli Road.

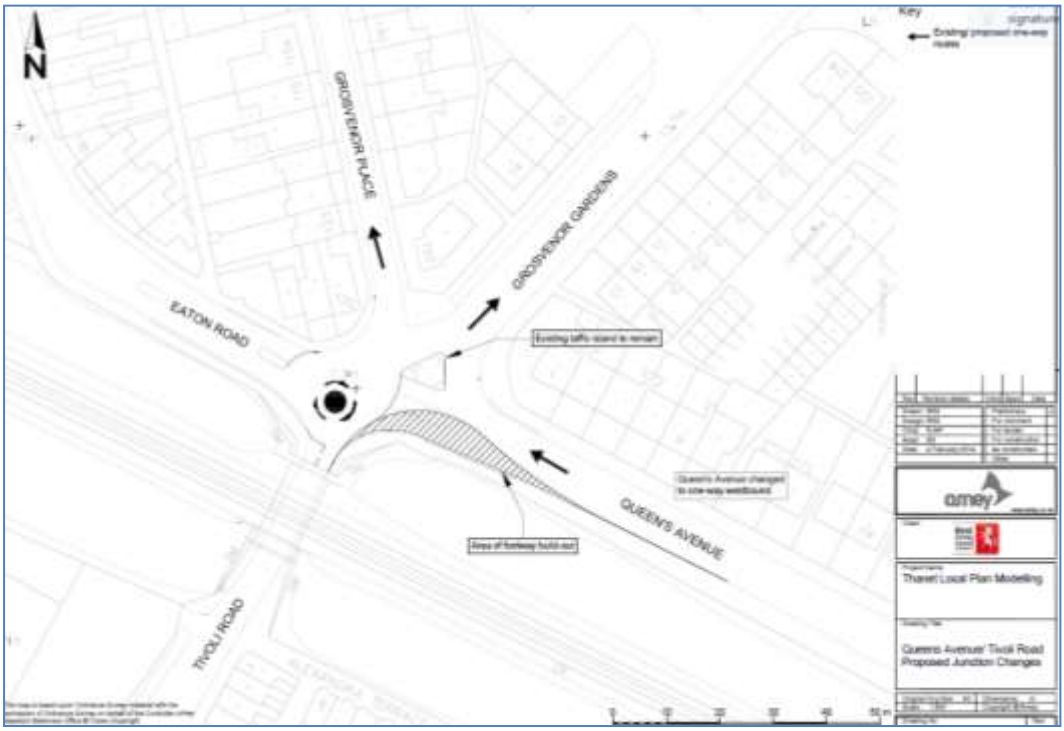


Figure 26 - Queens Avenue Junction Improvements

9.6.10 Network modifications are currently being explored to provide an alternative route for tourist traffic destined for Margate, away from Marine Terrace via the Tivoli area and into Margate using Eaton Road, Belgrave Road and Hawley Street. This approach would assist in managing traffic volumes along Marine Terrace, which in turn would facilitate further pedestrian improvements within the corridor in the future.

Figure 27 - Queens Avenue Junction Improvements

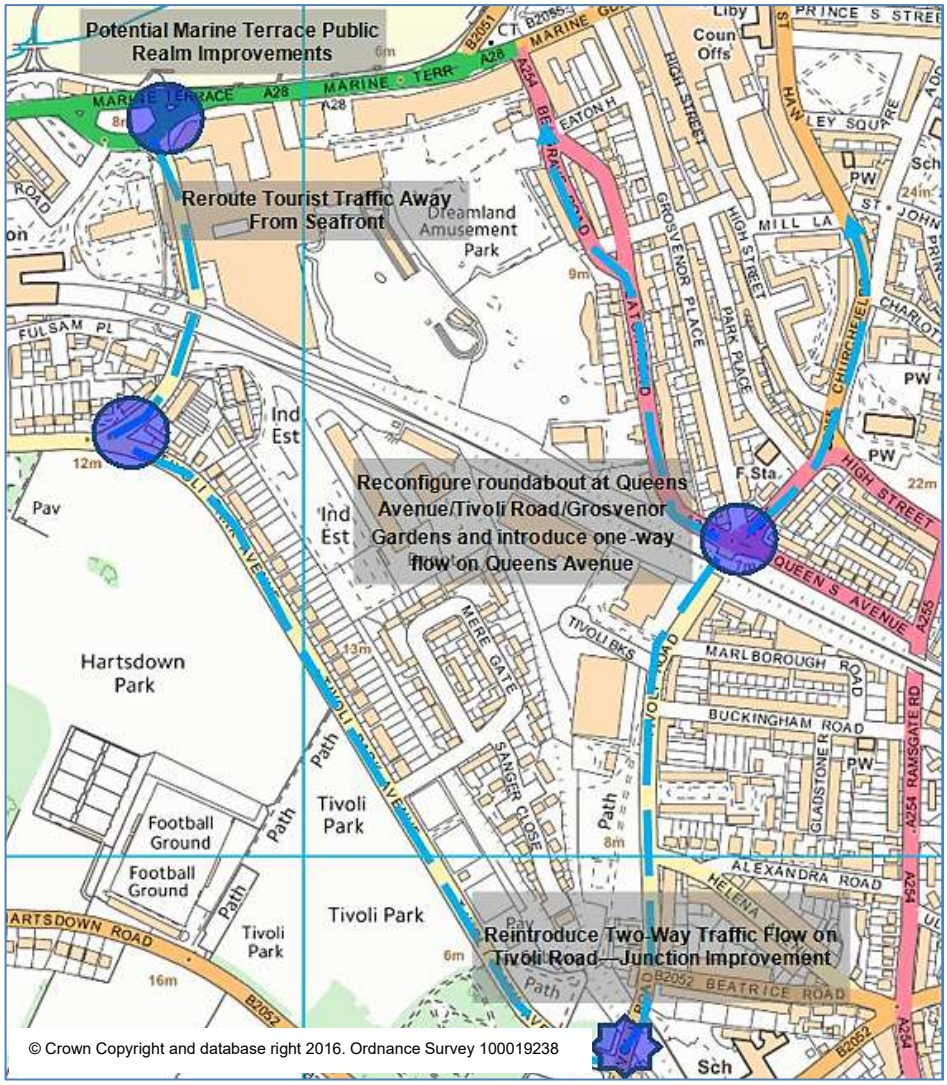


Figure 28 - Potential Future Access Strategy for Margate Town Centre

9.6.11 There are a number of amenity, land and engineering considerations to overcome before such a strategy could be implemented, however further detail and consultation on such an initiative would be forthcoming as the strategy develops further.

10 Sustainable Transport Interventions and Policies

10.1.1 Whilst the provision of new and improved vehicular routes is essential to the future prosperity of Thanet, it is equally important for a balanced strategy to make provision for non-motorised road users and public transport. Whilst the ICRIS will make provision for new and enhanced foot and cycle connections within the district, it is necessary to complement them with further measures to encourage sustainable travel.

10.2 Reducing the Need to Travel

10.2.1 National trends suggest that private car trips are generally becoming longer and more frequent in nature. In many cases the car is the most convenient form of transport and for some road users is an essential for logistical reasons. Private cars do however inherently occupy a considerable amount of road space when measured per passenger.

10.2.2 The advent of new forms communication technology has seen an increase in the ability for people in certain work sectors to either work from home or from satellite offices/facilities. This has seen a general increase in home working over the last decade, with the most recent census suggesting that over 5% of working residents within the District primarily work from home.

10.2.3 Where working at home is not a feasible option, Public Transport, Cycling, Walking and Car Sharing all occupy less road space than single occupancy journeys. Therefore if more people used sustainable forms of travel, all road users who need to make a journey by vehicle are more likely to experience shorter and more reliable journey times.

10.2.4 A reduction in the need to travel will be achieved by encouraging the following:-

Figure 29 - Strategies for Reducing the Need to Travel

10.3 Sustainable Development & Travel

10.3.1 As specified within the National Planning Policy Framework (NPPF) land uses will be balanced to maximise the opportunity to minimise journey lengths for employment, shopping, education and leisure. TDC and KCC will work together within the framework of the planning process to encourage sustainable travel habits by seeking to:

- Locate development close to existing sustainable transport opportunities, or delivery of new connections/services through planning obligations
- Shape development to encourage walking and cycling through inclusive design.
- Promote mixed use developments where appropriate
- Deliver community infrastructure on larger scale developments (schools, local shops and other community based uses).

10.4 Travel Planning

10.4.1 Travel plans are an effective way of setting out measures and initiatives to encourage sustainable travel habits and reducing the reliance on the private vehicle. Whilst Travel Plans can be effective in managing the impact from residential development with a high level of car based commuting, they are especially suitable for large employers, either through planning obligations or through more proactive employers committed to encouraging good health and wellbeing within their workforce.

10.4.2 All development proposals that will generate a material increase in the need to travel will be required to implement sustainable travel statements, outlining a number of sustainable travel measures such as “Taster Cards” for local bus services, discounts on new cycles for residents/employees, electric charging points amongst others.

10.4.3 Development proposals that have a significant adverse impact on the local highway network which are unable to be fully managed through physical infrastructure provision, will be required to produce travel plans with ongoing monitoring mechanisms. Depending on individual circumstances, this may then provide an opportunity to manage residual impacts through positive measures. These instances will need to be assessed on a case by case basis taking into account the enforceability and feasibility of achieving the required travel mode targets over an extended period of time.

10.4.4 KCC offer support and guidance to anyone interested in developing a travel plan. Through a web-based Travel Plan Monitoring system (Jambusters), the county council provides free web based site audits and surveys which highlight current travel patterns and opportunities to bring about modal shift.

10.5 Bus Interventions / Strategies

10.5.1 Irrespective of the need to widen choice regarding means of travel, many people cannot drive and for some a car may be an unwarranted cost pressure. Continuing to widen the attractiveness and convenience of travel by bus can serve to advance the following:

- Potential reduction in vehicle movements thus facilitating walking and cycle travel
- Reduced pressure for use of land for car parking in urban centres thus supporting new development opportunities/better use of public space
- Reduced journey times making buses a more attractive means of travel.
- Reduced journey times for motorists who choose to drive

10.5.2 Bus services can also be predicted to improve as a consequence of the above factors. The Quality Bus Partnership allows all partners to influence these improvements. Stagecoach has given a commitment to:-

- Increase frequency of services as passenger numbers grow (subject to costs remaining the same)
- Increase frequency of services as journey times decrease (as one bus can cover more miles if it is delayed in traffic for less time)

10.5.3 The re-development of the bus route network in 2004 and the subsequent support for bus services through the QBP have established underlying growth in the bus network. Whilst the projected increases in passenger numbers in future years appear less dramatic in percentage terms they actually constitute greater absolute growth.

10.5.4 Key actions and initiatives to facilitate this growth are summarised below:-

- Investment commitments by the commercial operator (including commitments given by Stagecoach East Kent) to increase frequencies based on increased passenger numbers and improved journey times.
- Service delivery to be measured through a list of Targets supplied to the Quality Bus Partnership.
- Initiatives to achieve reduced journey times and punctuality improvements including measures to address areas of the network where buses are impacted, such as QEQM Hospital.
- Promotion of smart ticketing and advance payment to reduce dwell time at stops.
- Effective and considerate Streetworks coordination, with a strong emphasis on minimising the impact on bus routes
- Audits to identify and action potential micro-delay points along routes.
- Provide bus stops fully accessible to all users

10.5.5 Opportunities to expand the commercial network, providing improved services for the public (coverage/frequencies etc.) and also reduce reliance on KCC subsidies will be key aims across the plan period.

10.5.6 Stagecoach is committed to further developing the local network to support planned housing growth in Thanet. Outline discussions have been held already with a view to formalising proposals as the sites move closer to submission of applications. Naturally any solutions involving supported bus services will need to be considered in line with the policy position of the county council at the time of inception.

10.5.7 In principle the following outline solutions have been discussed:

- Manston Business Park – improvements to service 38* (Birchington – Ramsgate).
- Nash Road/Westwood – initial improvements to service 8 already agreed with developers and scope to improve.
- Westgate/Garlinge – there is adequate service provision along the key A28 corridor; Stagecoach will review service 32 (Dane Valley – Garlinge) to penetrate the proposed developments.
- Birchington Strategic – Stagecoach is reviewing the provision of services to Minnis Bay and is likely to propose a diversion to one of the current services using Station Road/Minnis Road to instead divert to serve the Brooksend – Minnis Road link. The allocation to the south east of the A28 would be covered by revisions to service 38*.
- Manston Court Road/EuroKent/Manston Green – likely to be served by a combination of diversions/enhancements to the Loop/8/34 services, again providing links to Thanet Parkway station.

*38 – this service is operated by Stagecoach South East under contract to Kent County Council. While Stagecoach can suggest enhancements to the service, it is ultimately the County Council's decision whether to adopt these and the operation of the service is subject to the availability of funding at the time of inception.

10.6 Further Rail Improvements

10.6.1 KCC are working in partnership with Network Rail to deliver a 10-minute planned journey time improvement scheme on the existing line between Ashford International and Ramsgate Railway stations. If line speeds increase, then journey times would drop from 36 to 26 minutes, providing journey times from St Pancras to the prospective Thanet Parkway Station around an hour. This opens up enhanced tourism, regeneration and business opportunities.

10.6.2 More recent improvements to Rail services in the county include the Journey Time Improvement (JTI) scheme, between London, Ashford and Thanet. The aim of this project is to reduce the rail journey time between Ashford and Ramsgate through a package of engineering interventions.

10.6.3 The first phase of JTI, between Ashford and Canterbury West, was recently completed with journey time savings being realised within 2018. The second phase, between Canterbury West and Ramsgate, is due for completion by 2019/20. These improvements complimented by with the provision of a new Parkway Station would significantly enhance the accessibility of Thanet in relation to the rest of the County and London.

10.6.4 The delivery of a New Parkway Station within Thanet is a key component to improving access to Rail travel for existing and future residents within the District. The Thanet Parkway Project Plan expresses a commitment by the County Council, alongside Thanet District Council and Network Rail, to bid for capital funding contributions to secure delivery of the Parkway Station. It also acknowledges the need to integrate the Parkway with the bus network, walking and cycling routes supported by secure cycle parking, information and other facilities.

10.7 Walking & Cycling Interventions

10.7.1 Walking is a necessary mode of transport for nearly every journey that people undertake (if only in part for some journeys). It generally forms the most accessible form of transport available. Thanet is generally very urban in nature, therefore enjoys a relatively good network of footways, however given that some urban settlements are semi-rural in nature the links between these settlements are often more restricted in nature, which can discourage longer distance journeys by foot.

10.7.2 Pedestrians are a particularly vulnerable to hazards posed by traffic and other users of the highway and some of Thanet's semi-rural communities are far less accessible than others in terms of footway connections. Villages such as Acol and Manston and Minster are a good example of this.

10.7.3 It is the intention of this strategy to concentrate on areas of the network where new and improved pedestrian connectivity can be achieved in a joined up and cost effective way. Therefore it is intended that walking will be encouraged in all new development sites by providing a safe, direct and pleasant environment through positive design and master planning.

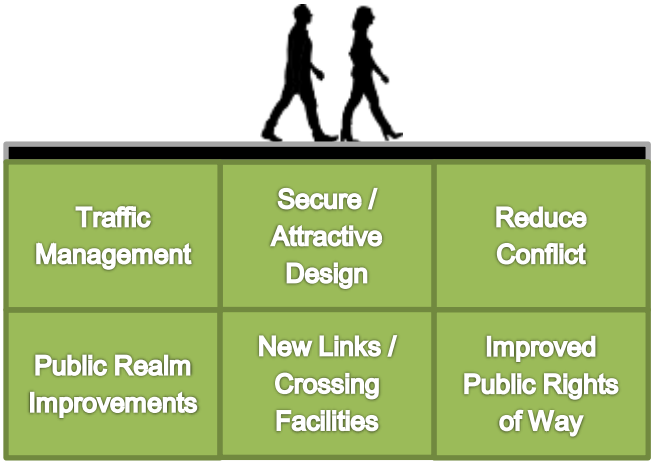


Figure 30 - The Foundations for Encouraging Walking Trips.

Public Rights of Way (PROW)

10.7.4 Thanet is fortunate to have a wide network of Public Rights of Way (PROW) and these play an important role in providing access to both urban and rural destinations. The role of this network is valuable not only providing a recreational outlet free to the public, but also helping to encourage sustainable travel choices which ultimately have an impact on traffic congestion and air quality.

10.7.5 Access to the countryside and walking, cycling and equestrian activities provides significant support to the local economy. Access to green space is a significant factor in enabling people to improve their health and well-being.

10.7.6 The KCC Countryside and Coastal Access Improvement Plan (CAIP) covers the period between 2013 -2017 and provides a policy basis for improved access and connectivity within the county. Development has a role to play in delivering key pieces of PROW infrastructure.

10.7.7 Whilst it is not the role of this Transport Strategy to replicate the contents of the CAIP, a number of priority schemes have been identified within the District which are directly related to proposed development.

Mobility Impaired Pedestrians

10.7.8 The needs of pedestrians can be very diverse, with physical ability, confidence judgement and self-awareness all contributing to challenges that road users face. What could be a relatively easy journey for one person could represent a significant struggle for another.

10.7.9 Mobility impaired pedestrians could include, Wheelchair Users, Elderly, Infirm, Children, visually impaired members of the community or parents with pushchairs. It is essential that development contributes towards making non-vehicular journeys as straightforward as possible, to build a truly inclusive highway network to serve all.

10.7.10 KCC and TDC recognise that the needs of all users is essential for new and existing highway infrastructure, to ensure that those with impaired mobility enjoy the same access and opportunities that most people take for granted.

- Provision of pedestrian ramps/aids at key crossing locations
- Provision of pram crossings and tactile paving where appropriate
- Removal and enforcement of obstructions present on the highway network.
- Reduction in street clutter including signs and other street furniture.
- Wayfinding signage to key destinations to provide people with confidence.
- Effective design of pedestrian routes to improve safety and security (overlooking, lighting etc.)
- Cater for desire lines thus reducing walking distances to key destinations.

It is essential that the above elements are considered for all new developments and highway schemes.

Cycling

10.7.11 The Cycling Strategy for the plan period will concentrate on eight main themes:

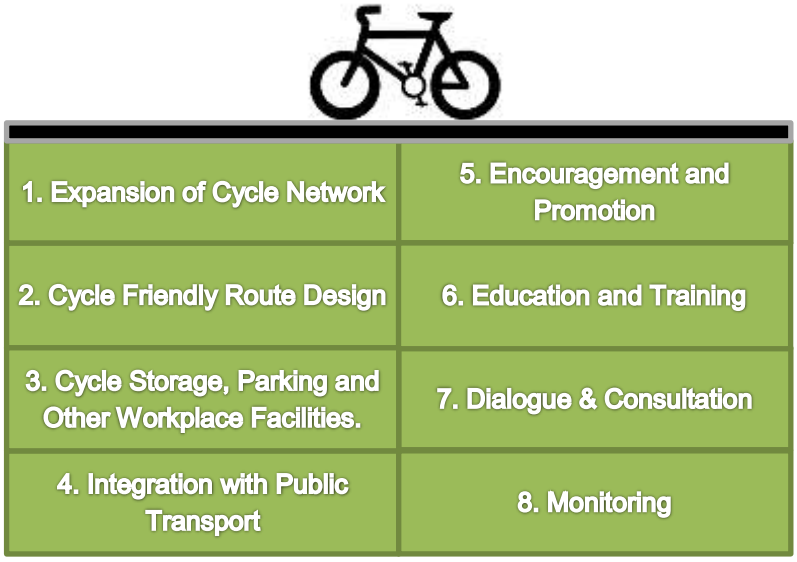

1. Expansion of Cycle Network
5. Encouragement and Promotion
2. Cycle Friendly Route Design
6. Education and Training
3. Cycle Storage, Parking and Other Workplace Facilities.
7. Dialogue & Consultation
4. Integration with Public Transport
8. Monitoring

Figure 31 - The Foundations for Encouraging Cycling.

10.7.12 Cycle friendly route design will improve safety and convenience for cyclists leading to safer and more attractive network for cycling linking to important destinations. High priority will be given to cyclists in all traffic management areas and in the design of new roads through development opportunities. The following policies and actions will be pursued:

10.7.13 New developments must consider the needs of cyclists and pedestrians in terms of design, layout and permeability. Where master planning and efficient use of available land allows, traffic free cycle and pedestrian networks should be encouraged to provide safe, direct and attractive environments, where pedestrians and cyclists have priority over vehicles and/or vehicle speeds are kept low. These principles, follow the methodologies outlined in the Kent Design Guide and will be used to secure high quality design for new development.

10.7.14 Cyclist and pedestrian needs are to be considered at an early stage of all new development proposals. There will be a presumption in favour of incorporating facilities to benefit cyclists in all schemes, thus:

1. Schemes involving new housing will incorporate in planning appropriate parking for cycles, road networks friendly to all users and links to existing cycle routes to ensure connectivity to schools, places of work and retail outlets.

2. Where appropriate new internal estate roads within developments will be designed to encourage speeds of 20mph or lower. Local distributor roads will be designed with segregated cycle provision

3. Where schemes involve signal junctions it is recommended that they will incorporate facilities such as cycle lanes and advanced stop lanes and lighting sequences that considers cyclists

4. Segregated facilities or cycle lanes will be provided wherever possible as part of new road schemes, ensuring safe passage through junctions.

5. Traffic calming will use cycle friendly measures.

6. Cyclists will be generally exempted from all new road closures, one way restrictions an banned turns, except where there is a technical or safety case for not doing so.

7. Cycle parking will be provided in appropriate locations in accordance with specified standards.

10.7.15 A Cycle Audit will operate in parallel with Road Safety Audits that are a statutory requirement of any new highway route, to ensure adherence to appropriate and high quality design standards.

10.7.16 A primary target of this strategy will be to provide the missing links in the existing routes to give connectivity and safety on the Thanet Cycle Network by the end of the Local Plan period. The already well developed longer distance network and National Cycle Network will link Thanet's towns to each other, to other towns in East Kent and to the countryside. While off-road paths have an important role in the networks, many routes use both major and minor roads. On main roads forming part of the cycle network, priority will be given to achieving continuous facilities where highway geometry or land availability allows.

10.7.17 Cycle network proposals will be further developed in consultation with the Thanet Cycling Forum and other interest groups as a matter of course.

10.8 New / Improved Walking & Cycling Links

10.8.1 Identified links to be addressed to support improved pedestrian and cycle linkage between proposed growth areas are as follows:-

1. Construct shared facility on Sloe Lane, Margate to complete a route between Dane Valley and Westwood.

2. Improvements to Westwood main junction and adjacent roads to improve bus and cycle provision and improve accessibility and movement for pedestrians between different areas of Westwood Town Centre

3. Create shared facility on existing path to the rear of Bromstone School, Broadstairs to connect to Millennium Way to offer alternative to cycling on Rumfields Road between Broadstairs and Westwood.

4. Provide improved surface and widen Bridleway TM16.

5. Provide improved surface and widen Bridleway TM11.

6. Upgrade Footpath TM14 on edge of development to Bridleway.

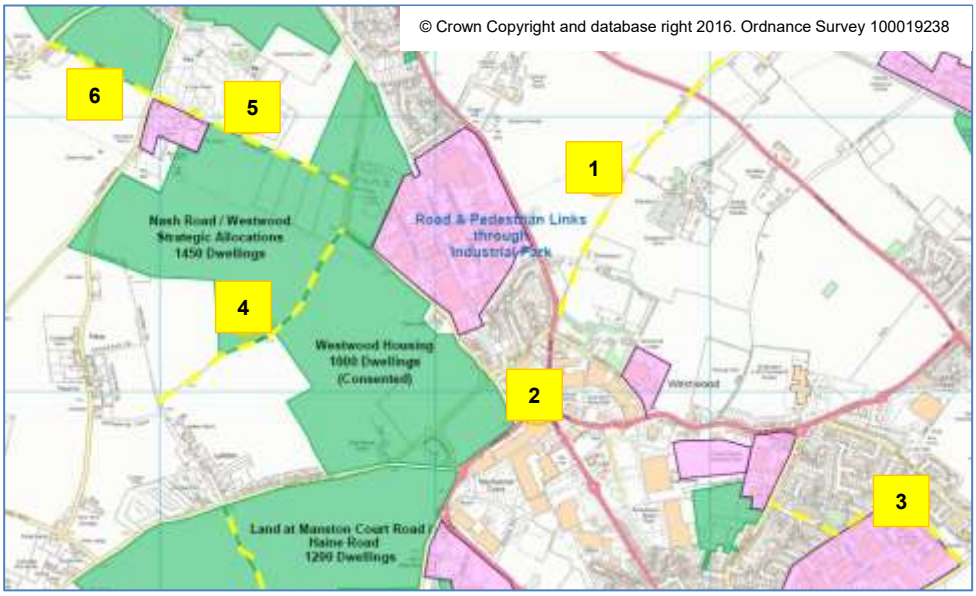


Figure 32 - Cycle Route Improvements around Westwood

7. Create shared facility on existing footpath between Ramsgate Road, Broadstairs and Dumpton Park Drive, Broadstairs to the side of former Holy Cross School. Then continue above shared facility between Ramsgate Road, Broadstairs and Rosemary Avenue, Broadstairs

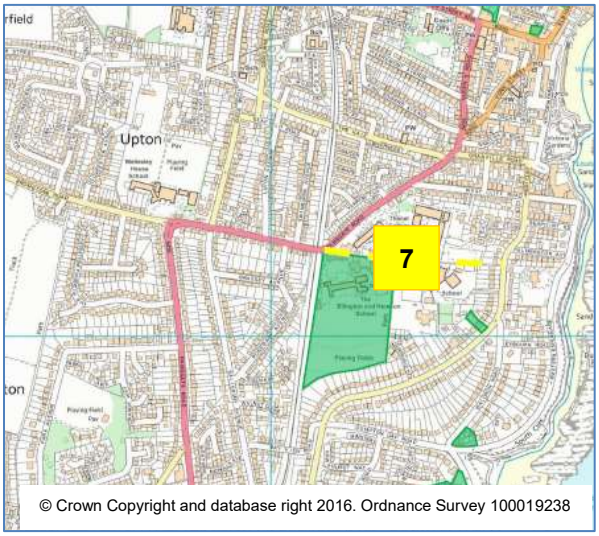
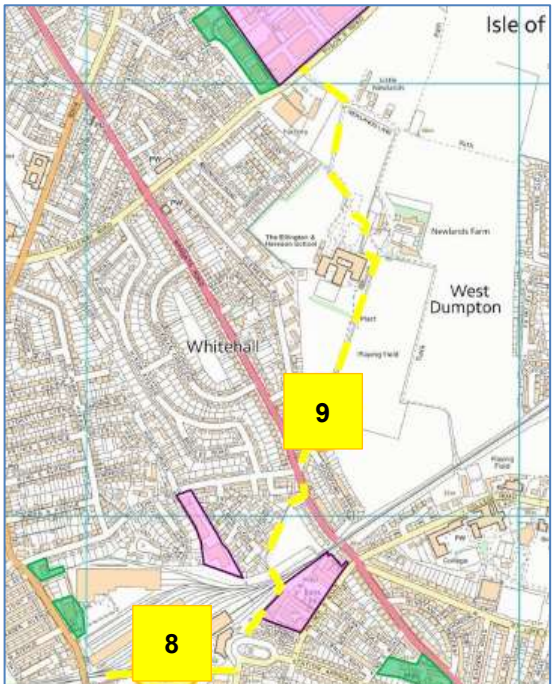


Figure 33 - Cycle Route Improvements - Ramsgate Road to Dumpton Park Drive, Broadstairs

8. From Ramsgate Railway Station create shared facility on existing footpath to Newington Road.

9. From east of Ramsgate Railway Station create shared facility on existing path to Margate Road, provide crossing facility to access Newlands Road and create link to Pysons Road using Newlands Lane.



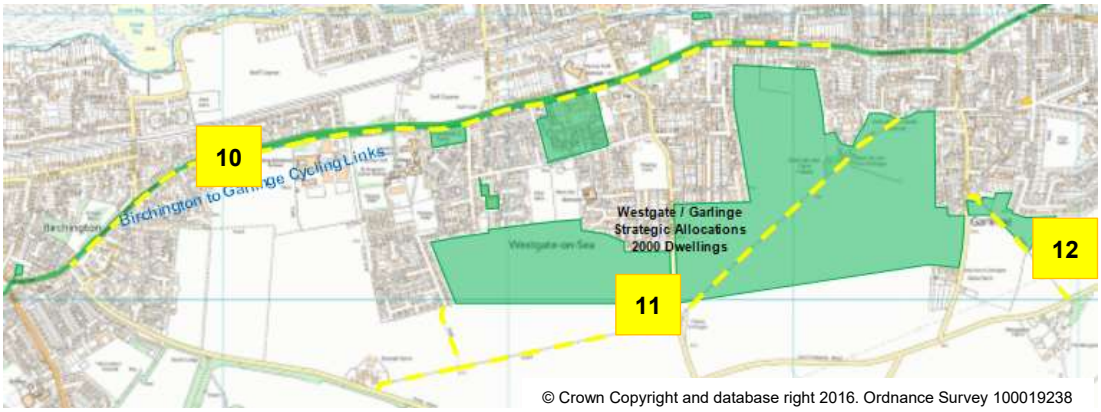
© Crown Copyright and database right 2016. Ordnance Survey 100019238

Figure 34 - Cycle Route Improvements - Ramsgate Rail Station to Newlands Lane

10. Provide a new off road cycle facility (on existing footpaths) to link Birchington to Margate including existing secondary schools, residential settlements and commuting destinations

11. Creation of shared facility on existing public rights of ways between Dent-de-Lion Road, Garlinge and Park Road, Birchington.

12. Improvement of Bridleway TM22 surface to width of 3m as part of Garlinge development.



© Crown Copyright and database right 2016. Ordnance Survey 100019238

Figure 35 - Cycle Route Improvements - Birchington/Westgate/Garlinge

13. Off road section between Convent Road, Broadstairs and the existing off road shared facility further along Joss Gap Road (on edge of golf course).

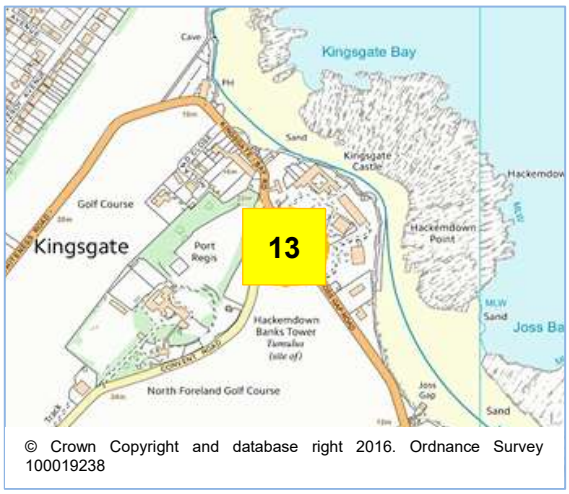


Figure 36 - Cycle Route Improvements - Convent Road, Broadstairs

14. Creation of shared facility on south east side of Dane Park, Margate to link Dane Valley cycle route with Northdown Road, via St Dunstan's Avenue.

15. Provide missing shared facility on SW side of St Peter's Road between Broadley Road and Lister Road, Margate

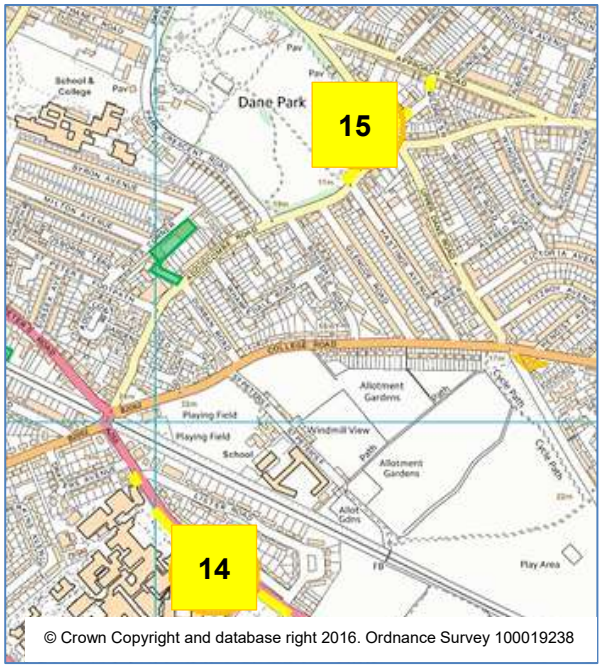


Figure 37 - Cycle Route Improvements - Dane Valley Road/St Peter's Road, Margate

16. Provide new shared facility between Durlock and Sevenscore as alternative to Grinsell Hill/ The Lanes/Foxborough Lane.

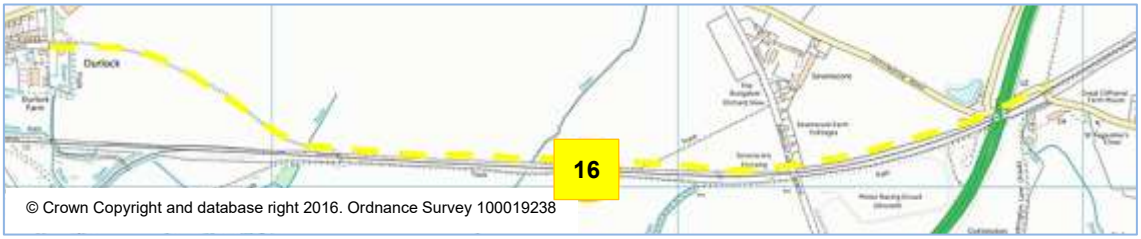


Figure 38 - Cycle Route Improvements - Durlock/Sevenscore

17. Upgrade Footpath TR24 to Bridleway - Crossing point required on Manston to Haine Road Link.

18. Upgrade Footpath TR9 to Bridleway *(Delivery of this route is dependent on uses within airport site)

19. Improve surface of Bridleway TR8 and widen to 3m* *(Delivery of this route is dependent on uses within airport site)

20. Creation of new Bridleway and Improve TR32 to link Parkway Station to Manston *(Delivery of this route is dependent on uses within airport site)

21. Improve surface of Bridleway TR10 and widen to 3m.

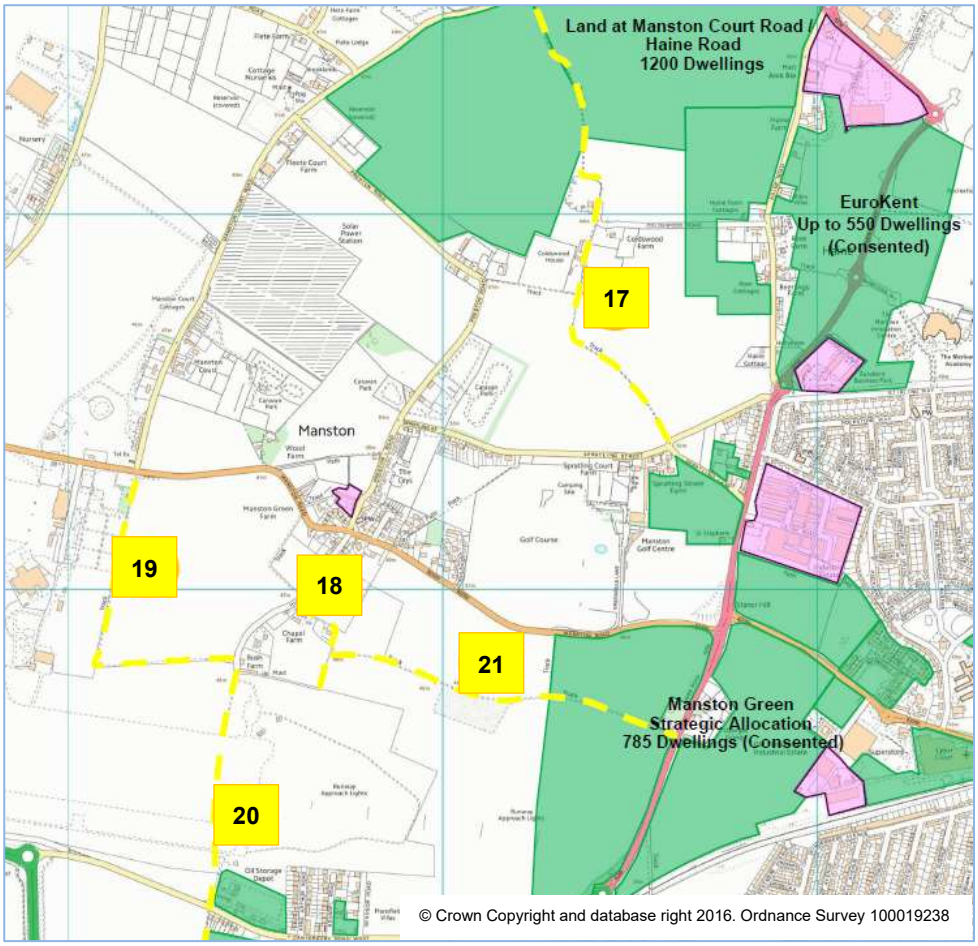


Figure 39 - Cycle Route Improvements – Manston/Cliffsend

22. Upgrade footpath TM31 to Bridleway to link to TE12A & Shottendane Road improvements to provide shared use pedestrian cycle route.

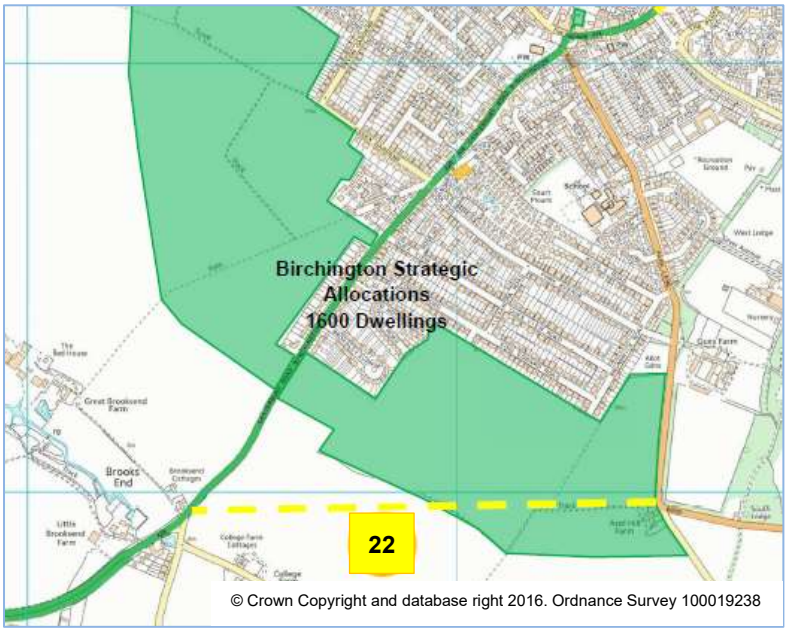


Figure 40 - Brooksend PROW Improvement

11 Informing Growth Options in the New Local Plan

11.1.1 The Local Plan will need to plan for growth, including land needed for business development and new housing, over the period to 2031. The Plan preparation process includes assessing options on how much development should be planned for and the most sustainable locations to accommodate it.

11.1.2 Government's National Planning Policy Framework (NPPF) states that transport policies have an important role to play in facilitating sustainable development and in contributing to wider sustainability and health objectives. Key messages include that the transport system needs to be balanced in favour of sustainable transport modes, giving people real choice about how they travel. Local Plans are therefore required to ensure that developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable modes will be maximised. Their policies are expected to aim for a balance of land uses to encourage people to minimise journey length for employment, shopping, leisure, education and other activities.

11.1.3 The NPPF recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable travel will vary from urban to rural areas.

11.1.4 In identifying the most suitable options for the location of new development in the Local Plan, it is important to assess locations in terms of ability of people to access services and employment, and where feasible to do so without the need to rely on private cars. Such assessment has been built in to the process applied to identify proposed housing land allocations.

11.1.5 Nonetheless people will still elect to use cars, and the capacity of the transport network for cars and other forms of transport will be an important factor in considering options for locating development and associated transport infrastructure requirements.

11.2 Thanet Transport Network Highway Model

11.2.1 The characteristics of Thanet's transport network are an essential starting point in considering the transport implications, opportunities and associated infrastructure requirements related to growth options. The strategy for addressing the likely impacts of strategic growth have firstly been appraised at a high level, taking into account known areas of congestion and how this might be manged by either upgrading or improving existing routes or making better use of underutilised infrastructure.

11.2.2 The process of identifying managed growth within the Thanet Area has taken some considerable time and has undertaken further iterations. As such the approach to appraising the impacts and testing proposed mitigation associated with local plan growth has evolved with it.

11.2.3 A strategic transport model was originally constructed in 2010, enabling Thanet's highway network capacity to be evaluated in a range of scenarios, from its 2011 baseline the model was capable of providing forecasts for any year up to 2033 based on variable options regarding the quantity and broad location of development. This model informed initial appraisals of the 2015 Preferred Options Consultation.

11.2.4 The model covered a number of key routes into Thanet primarily focussed on the principal route corridors crossing the district. The core network was modelled in detail and focussed on the corridors in and around Westwood.

11.2.5 The first iteration of strategic modelling that was undertaken to appraise local plan options focussed on main routes within Thanet linking the key towns and a number of key locations generating/attracting trips. These included Westwood Cross shopping centre, several large supermarkets and the QEQM Hospital.

11.2.6 The 2011 baseline scenario indicated that travel demand and constraints in the highway network culminate in high levels of congestion and "rat running" at peak times and on Saturdays. This will potentially be compounded by natural and planned growth. It indicated that a number of junctions experience serious "worst turn" delays. However it is important to note that such classification may be triggered by a single recorded vehicle turn and therefore informed interpretation is required.

11.2.7 The model served to inform this Strategy by highlighting existing and potential pinch points in the network. This Strategy has identified the need to tackle capacity issues identified at Coffin House Corner, Victoria Traffic Lights, Margate seafront and Clock tower, and Tivoli Bridge/Queens Avenue.

11.2.8 To enable effective testing of the proposed local plan growth on the local highway network and potential strategic highway interventions, it was necessary for a wider Strategic Highway Model to be built to encompass a wider area of the district. The purpose of the model is to identify future highway traffic flow conditions (with and without proposed development) and assist in identifying potential solutions to future growth needs and to provide a more recent picture of highway conditions.

11.3 New Strategic Highway Model

11.3.1 Amey were commissioned by Kent County Council (KCC) to develop a strategic transport model for Thanet district for the purposes of testing forecast development and transport intervention scenarios for the emerging Local Plan to 2031.

11.3.2 When considering the coverage of the model a number of constraints needed to be considered. It is important to strike a balance between the time that the model takes to develop, the cost of the study against the outputs that are required.

Base Model

11.3.3 A 2017 base year model was initially developed using SATURN software. The area of focus for the model is the A28 and A254/A256 corridors, as the proposed major allocation sites and infrastructure improvements within the Local Plan are located around this area. The figure below shows the detailed modelled area (purple) and area of interest (brown) for the model:

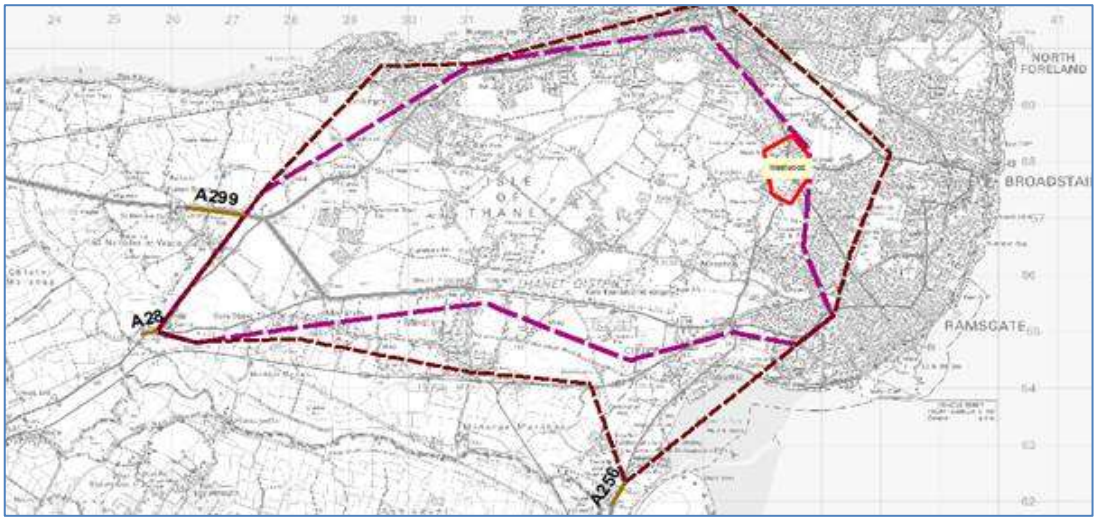


Figure 41 - SATURN Model Study Area

11.3.4 The model zoning system is based largely on the 2011 Census Lower Super Output Area (LSOA) boundaries and the Thanet area is made up of 93 zones. There is one notably large output area which encompasses the rural hinterlands of Thanet. This has been divided into three zones, including a bespoke zone for the Manston Business Park on Columbus Ave. The Westwood area (Westwood Cross shopping centre, two supermarkets and three retail parks) has also been designated as a specific zone.

11.3.5 The baseline traffic data underpinning the model comprises various datasets and sources. The principal source of origin/destination data was obtained from mobile phone data provided by Vodafone. The data was expanded from the sample using Census household population figures. In addition the following data was also used to develop, calibrate or validate the base model:

- Manual Classified Junction Turning Counts;
- Automatic Traffic Surveys;
- Queue Length Surveys;
- Average Journey Time data; and
- An ANPR survey around the Manston Airport site.

11.3.6 Based on the broad understanding of the likely options to be tested, the AM and PM peak base models were considered to provide an appropriate tool to form the basis of forecast assessments of the impact of potential development and infrastructure improvements on the local network to support the Local Plan.

Forecast Model

11.3.7 A number of forecast scenarios have been assessed for the forecast year 2031, which represents the end of the proposed Local Plan period. Fundamentally the forecast scenarios are based on a single spatial strategy for development and were intended to test the impacts of that development scenario with and without the proposed Transport Strategy interventions. The forecast scenarios are summarised in the table below, more detailed commentary on these outputs can be found within the Forecasting Report, which accompanies the local plan evidence base.

Forecast Model		Model Summary
DN	2031 Do Nothing	• 2031 forecast travel demand from committed/permitted development (including Manston Green and EuroKent); • Committed highway improvements (e.g. Manston Green proposals)
DM	2031 Do Minimum	• As per the Do Nothing scenario; plus • Strategic allocation sites
DS	2031 Do Something	• As per the Do Minimum scenario; plus • Proposed Transport Strategy interventions

11.3.8 The development strategy for the Local Plan is largely housing led, with employment land uses proposed to maintain the status quo in terms of the proportion of in/out commuting to/from the district. The breakdown of the housing allocations within the proposed Local Plan and included in the Do Nothing and Do Something scenarios is set out below (please note that housing completions up to 2016 are included within the base model traffic flows):

Development	Housing (units)
Permitted/committed development	3,700
Windfall sites	2,700
Local Plan sites	9,200
Total	**15,600**

11.3.9 The Transport Strategy interventions tested within the Do Something model scenario are highway only improvements consisting of a proposed 'inner circuit', comprising new and upgraded links, with the aims of providing more route choice options and relief to the existing A28 and A254/A256 corridors. An outline of the proposed 'inner circuit' proposals is shown alongside the principal Local Plan allocation sites in the **Figure 42**.

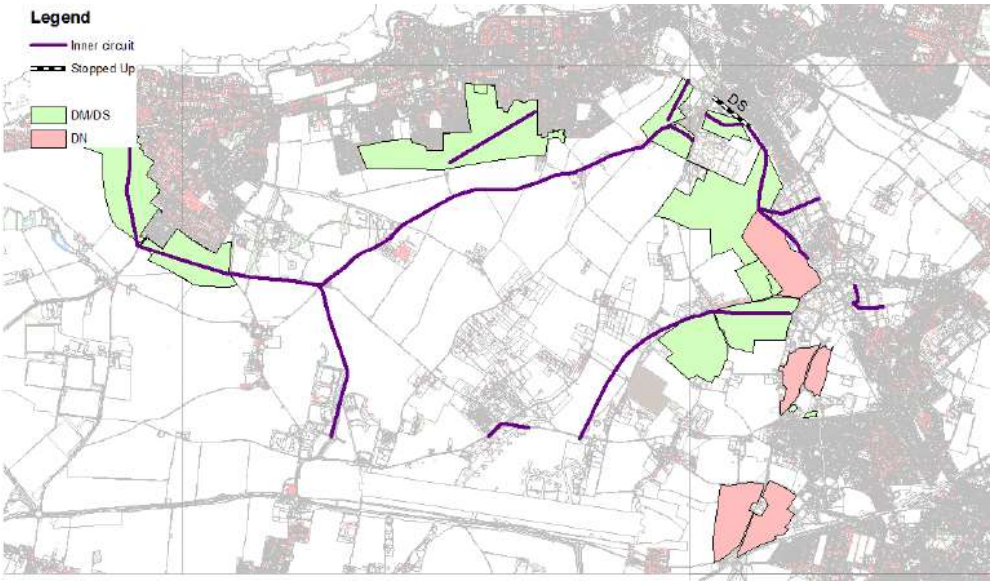


Figure 42 - Model Infrastructure Scenarios

A list of the proposed transport interventions included within each of the scenario is provided below:

Modelled Transport Interventions	2031 DN	2031 DM	2031 DS
Manston Green Network (including Staner Hill)	Yes	Yes	Yes
Spitfire Corner (upgraded from staggered crossroads)			Yes
Manston-Haine link (2.6km)			Yes
Brooksend-Shottendane link / Link through Westgate development / Shottendane- Hartsdown link			Yes
'Nash Rd network' including stopping up at Coffin House corner			Yes
Columbus Avenue extension			Yes
Acol traffic-calmed (all through traffic removed)			Yes
Enterprise Way link			Yes
Tesco link road / Millennium Way extension			Yes
Shottendane Road speed reduction (40mph from 60mph)			Yes

11.4 Headline Model Outputs

11.4.1 The total number of trips within the modelled area (travel demand) provides an indication in terms of the overall traffic impacts of each forecast scenario. The level of travel demand is intrinsically linked to the level of proposed development within each scenario; as such the travel demand within the Do Minimum and Do Something scenarios is the same. The table below provides a summary of total travel demand in the AM peak (busiest period) compared with baseline conditions:

AM Peak	2016	2031 DN	2031 DM/DS
Total	22,466	25,007	28,428
% increase over Base		11%	27%
% increase over DN			14%

11.4.2 In terms of more localised impacts, particularly on the A28 and A254/A256 corridors, the modelled scenarios indicate a general pattern, whereby, the peak hour traffic flows show an increase in the Do Minimum scenario versus the base; followed by a slight decrease in the Do Something scenario. This is not the case at all locations, however, and in some cases the Do Something scenario would observe no impact or an increase in flow when compared with the Do Minimum.

11.4.3 Graphs showing a comparison of AM peak (busiest peak) traffic flow at key links and junctions on the key corridors between the modelled scenarios are shown below:

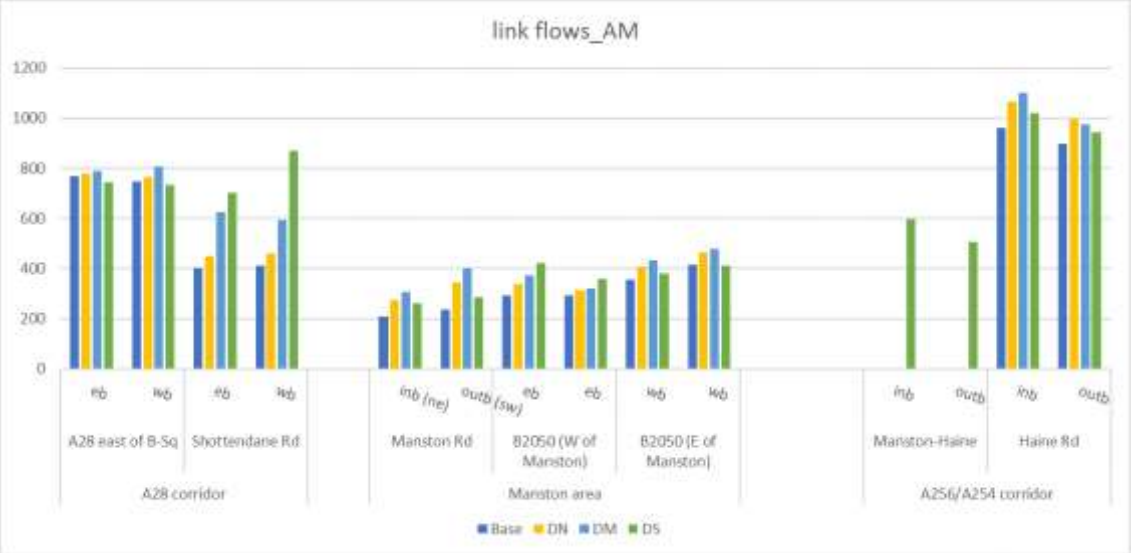


Figure 43 - Traffic Flow on the Local Highway Network

11.4.4 The provision of the ICRIS has a positive impact on flows within the A28 corridor through Birchington Square. There is also a reduction in flow through Park Lane (when compared to the do minimum scenario), which currently contributes towards a significant level of delay on the A28 through right turning traffic and blocking back. Flows at the A28 St Mildred's junction are reduced,

11.4.5 The impact of the Local Plan allocations within Margate Seafront are likely to be reduced by the ICRIS, however remain above the baseline, which suggests that despite these improvements junction performance will continue to be impacted by the Local Plan growth and that alternative routes avoiding this part of the network should be explored.

11.4.6 St Nicholas Roundabout will be subject to material increases in traffic flow, however a visual inspection of this junction suggests that a level of residual capacity exists, which with minor modifications is likely to be accommodated. This will be investigated in more detail within future route studies and as more detailed transport assessments are undertaken in relation to strategic development sites as they progress.

11.4.7 The provision of a new road link between the B2050 Manston Road and A256 Haine Road, manages future flow increases to the existing Haine Road Corridor (A256) between Cliffsend and Westwood.

11.5 Conclusions

11.5.1 The future year forecasting stemming from the model notes that demand for travel on roads in Thanet will inevitably increase even if only as a consequence of an increase in car ownership and population over time, the flows on the principal road network will generally be managed by the provision of the ICRIS, however further detailed modelling of individual junctions will need to be undertaken as necessary.

11.5.2 It is important to note that this testing has been employed to inform broad options for disposition of development and possible need for junction improvements. Identification of preferred site allocations will be based on consideration of a range of factors in addition to transport considerations. Further modelling will be applied as necessary to test preferred site locations and explore solutions to address identified pinch points.

12 Potential Sources of Funding

The transport interventions outlined within this strategy are ambitious, however they are also considered to be realistic and achievable. There are a number of economic circumstances that can have an impact on the availability of funding for highway infrastructure. A draft Infrastructure Delivery Plan (IDP) is being prepared to support the forthcoming local plan, which will provide more detail on specific infrastructure elements and how they relate to specific development proposals within the district.

12.1 External Funding

12.1.1 There are a range of potential funding streams that can be accessed. With new funds being announced on a regular basis (often to very tight submission timescales), it is important for both KCC and TDC to be in a positon to submit high quality bids at relatively short notice if required.

12.1.2 Such funds are available through Department for Transport (DfT), competitive funding through bodies such as South East Local Enterprise Partnership (SELEP) and Housing and Communities Agency (HCA), along with more direct funding from Developers through the planning process.

12.1.3 External funding streams are generally announced on a regular basis, normally through central government departments. Local Growth Fund (LGF) was one such fund and to date. Across the county, KCC have successfully secured nearly £120m from LGF. This demonstrates that certain elements of infrastructure may not necessarily need to be funded directly by developers.

12.1.4 Smaller Interventions such as cycleway or public rights of way improvements can be subject to consideration under annual Local Transport Plan funding within KCC. This fund is variable from year to year and is subject to set funding criteria in accordance with their contribution toward strategic priorities.

12.2 Developer Funding

12.2.1 Through the development planning process, contributions can be sought towards infrastructure under Section 106 (s106) of the Town and Country Planning Act 1990. Local Planning Authorities at both tiers of local government can enter into a legally binding agreements with the landowners/developers to financially contribute towards infrastructure or services required to make their development acceptable in planning terms. KCC/TDC then receive this funding to deliver infrastructure projects tied to development, for instance it may be used to support a public transport service or provide a proportionate contribution towards a new road link.

12.2.2 The draft Local Plan proposes that section 106 agreements should be used to fund key infrastructure projects such as the ICRIS. The council is intending to use Community Infrastructure Levy (CIL) to fund smaller infrastructure projects.

12.2.3 The CIL is a similar methodology to s106, however this represents a fixed charge which is then applied to specific types of development for specific infrastructure projects (through a roof tax type approach). The nature and level of funding can be defined during the establishment of the CIL Charging Scheme.

12.2.4 Developer contributions can still be secured through s106 Agreements where a CIL charge also applies but the two mechanisms are not currently able to be used to fund the same infrastructure project.

12.2.5 An alternative method of delivering physical transport infrastructure is through direct delivery/construction by developers through planning obligations. A Section 278 or 38 (of the Highways Act 1980) agreement can be entered into which allows developers to either make modifications to or build new highway infrastructure for adoption by KCC.

Appendix A

Achievements from the Thanet Transport Plan 2005 – 2011

Measure	Timescale	Funding Source	Description/Progress
East Kent Access Phase 2 (A256/299)	2006 -2012	LTP	Completed - Improvement of the A299 between Minster roundabout and the Lord of the Manor junction, and improvement of the A256 from Lord of the Manor junction to the old Richborough Power Station site. The scheme cost £87m funded by the DfT with £5.75m from KCC. Work began on site in 2009 and the official opening took place on 23rd May 2012.
Westwood Cross access study	2005	TDC	Part implemented then superseded by Westwood Relief Strategy.
Manston Access	2005	Developer/LTP funding	Superseded by Thanet Transport Strategy 2015. - Improved local access to Kent International Airport and environmental measures to protect Manston and other villages.
Stour Valley Line upgrade study	2005	EK Partnership	Study completed - Undertake a study into the feasibility and costs of upgrading the Stour Valley Line railway between Thanet, Canterbury and Ashford as an alternative to the A28.
Freight routes	2005-6	TDC/KCC	Not completed. As part of the Freight Action Plan for Kent the preferred freight routes will be mapped and distributed. - Identify, sign and publicise strategic freight routes within the District.
Seek further ferry operator(s)	Ongoing	Officer time	Not completed - Seek a ferry operator.
Review traffic management options for Military Road	2005-6	Officer time	Change of use – now more café culture and pedestrian area with better integration with the tourist industry
Review potential bus/coach link between port and station	2005	Officer time	Not currently required. Ferry service has since closed.
Update Airport Master plan	2005	Privately funded	Completed - In November 2009, Manston Airport produced a Master plan to consider the growth at the airport up to 2018. - However, following subsequent sale and closure of Airport in 2014 it is now intended to assessing alternative options for development of the airport land.
Update Airport Travel Plan	2005-10	Privately funded	Not completed due to several changes of operators and future proposals for airport not materialising.
Traffic management/reduction measures	2005-10	Joint private/public funding	Completed - On behalf of KCC, Stagecoach operate the route 38/38A services between the airport, Ramsgate, Broadstairs and Birchington.
Bus link to Ramsgate rail station	2005	Privately funded	The Stagecoach Thanet Loop bus service runs past Ramsgate Station (approx. every 10 minutes)
Promote, protect and enhance walking/riding network around KIA, Manston	Ongoing	Officer time and private funding	Part completed - No longer pursued as circular route. Improvements sought as part of general PROW enhancements.
Roadside infrastructure improvements on Quality Bus Corridors	2005-6	UBC?LTP funding	Mostly completed •Margate–Westwood–Ramsgate (A254) •Margate–Broadstairs–Ramsgate (A255) •Margate/Ramsgate–Canterbury (A28) Improvements to roadside infrastructure on the Quality Bus Corridors where not provided for the new Thanet Loop service.
Real Time Passenger Information and bus priority at traffic signals	2005	Developer funding	Not completed - RTI no longer favoured by bus operator. New information methods under review Extension of bus priority at traffic signals on all major corridors.

Measure	Timescale	Funding Source	Description/Progress
Super Low Floor vehicles for Thanet – Canterbury Quality Corridor	2006	Private/public funding	8/8A (the main routes from Broadstairs/Margate to Canterbury - every 15 minutes) went 100% low floor in early 2009
Continue discussions on C.T.R.L. Domestic Service	Ongoing to 2009	Officer time	Completed domestic services on the high speed line began in December 2009 under a franchise agreement with South-eastern. Passengers can now get from Ramsgate to St Pancras International in just 1 hour 16 minutes, and journey times from other Thanet stations similarly reduced. Continue discussions to ensure an appropriate CTRL Domestic service to Thanet.
Lobby for localised East Kent service	Ongoing to 2009	Officer time	Domestic services on the high speed line began in December 2009 under a franchise agreement with Southeastern. Passengers can now get from Ramsgate to St Pancras International in just 1 hour 16 minutes, and journey times from other Thanet stations similarly reduced. Continue to lobby for a localised rail service for East Kent connecting into the CTRL DS.
Bus link to K.I.A	2005	Privately funded	Not completed - Encourage provision of an improved Local Bus Service between Ramsgate Station and Kent International Airport.
Investigate "Manston Parkway" station		Privately funded	Completed - Funding is largely secured and plans are being investigated for the Parkway station. An 8 week public consultation exercise is being undertaken in early 2015.
Review restriction controls (Government request)	2005	TDC	Review restriction controls after Government request on hackney carriage vehicles - an independent unmet demand survey was undertaken in 2007 by Halcrow Group Limited. As a result of that survey it was found that there was no unmet demand and the Licensing Board decided to continue restricting the number of hackney carriage vehicles
Encourage provision for taxis at out of town stores	2005	TDC	Encourage out of town supermarkets to provide specific facilities for taxis at out of town stores - there has been continuing dialogue with the Westwood Cross management company although these being private roads they are responsible for the provision of ranks within Westwood Cross
Review of Hackney Carriage Ranks	2005	TDC	A review of Hackney Carriage Ranks. (cost of signage) - this was included within the remit of the 2007 survey which concluded that there were sufficient ranks within Thanet.
25% of vehicles with disabled access	2005	Staff time	25% of vehicles suitable for disabled access. Gradual increase until 2013 to 50%
Implement 'Turner – Dickens a Flagship Walking Route for Thanet'	Ongoing – 2007	TDC	Completed - The Turner and Dickens Walk is now open and promoted, connecting Margate and Broadstairs
Provide drop kerbs, tactile surfaces, etc.	Ongoing	LTP	Largely completed - continue to provide dropped kerbs and tactile surfaces, where appropriate, as part of the footway maintenance and renewal programme.
Promote walking	Ongoing	TDC/KCC/PCT	Promote walking as a healthy alternative to the car for short journeys, including investigating with the Health Authority, opportunities for the wider availability of pedometers.

Measure	Timescale	Funding Source	Description/Progress
Measures to encourage walking	Ongoing	Officer time	Implement measures to encourage walking such as street seats, improved street lighting, signage and removing obstacles and trip hazards.
Implement “Feet First” network	Ongoing to 2011	LTP and private funding	Progressively implement the network of multi-purpose walking routes detailed in “Feet First” through a series of “street audits” and engaging outside parties, where appropriate.
Implement the Dane Valley cycle route network	2004-7	LTP	The Dane Valley cycle route network has been expanded since the 1st Transport Strategy.
Promote cycling	Ongoing	LTP	Continue to promote cycling as a healthy alternative to the car for work and leisure journeys.
Continue work with Thanet Cycling Forum	Ongoing	Officer time	Continue to work with the Thanet Cycling Forum to promote and encourage cycling.
Implement Thanet Cycling Plan	2005-11	LTP, DfT, private funding	Part completed - The network has been expanded but the planned network in the Cycling Plan has not been fully achieved, partly due to insufficient funding. Progressively implement the planned programme of new and improved cycle routes detailed in the Thanet Cycling Plan and this Transport Strategy through KCC’s Local Transport Plan, various DfT initiatives and other public sources of funding. Also to pursue developer contributions, where possible, as part of the planning process.
Implement TDC Staff Travel Plan	2005		Not completed - Implement a Staff Travel Plan for T.D.C. bus concessions offered but not taken up by staff
Work with KCC and schools on School Travel Plans	Ongoing	Officer time	Ongoing - Work with KCC and local school communities to encourage the adoption of School Travel Plans for all Thanet schools.
Work with local businesses on Workplace Travel Plans	Ongoing	Officer time	Part Completed – KCC initiatives to encourage sustainable travel have been implemented such as FAXI and Workplace Challenge.
Require Travel Plans in support of planning applications	Ongoing	Officer time	Ongoing - Travel Plans are requested for significant developments. The smaller sites are required to produce a sustainable travel statement to show how they plan to encourage sustainable travel, and the larger sites must produce a Travel Plan that will be monitored by KCC.
Explore scope for sustainable events travel plan	2005 onwards	Officer time	Part completed - the scope for sustainable tourism and an events travel strategy. Continue to explore and develop
Produce new Parking Policy	2006	Officer time	Part completed - A major parking review was launched in Autumn 2012. Produce a new comprehensive parking policy, taking account of the issues facing Thanet, as outlined elsewhere in this strategy.
Assess demand and locations	2005 onwards	Officer time	Part completed - Assess demand and identify possible Home Zone locations, in conjunction with the local community.
Assess and prioritise requests for Homezones	Ongoing	Officer time	Part completed – very few if any applications received for home zones. Shared surfaces more commonly received.
Review existing schemes	Ongoing	Officer time	Completed - Review existing schemes
Evaluate new DfT regulations and guidance	2005	Officer time	Completed – new guidance adhered to.

Measure	Timescale	Funding Source	Description/Progress
Continue monitoring of Nitrogen Dioxide and PM10 at key locations	Ongoing	Officer time	Completed - The district has two junctions where nitrogen dioxide levels are recorded above the recommended level. This led to the declaration of an urban area Air Quality Management Area in 2011. - To continue monitoring of nitrogen dioxide and PM10 at key locations. The work to identify problem areas has yet to be completed. It is expected that the Detailed Assessment may confirm that there will be locations within Thanet where air quality standards are breached because of traffic related pollutants. Once these locations are identified appropriate transport Action Plans will need to be developed with the aim of reducing traffic emissions and achieving acceptable local air quality.
Explore future development and funding with Thanet C.T.	Ongoing	Officer time	Work with the Trustees of Thanet Community Transport to explore future funding sources and to encourage the development of the service.
Work with partners to promote rural Wheels 2 Work for East Kent	2005	East Kent Partnership	Not completed - Work with Action with Communities in Rural Kent, Thanet C.T., the East Kent Partnership and other partners to launch a Wheels 2 Work scheme for rural East Kent.
Implement "Feet First" and Thanet Cycling Plan	2005-11	See sections 10 and 11	The cycling network has been expanded but the planned network in the Cycling Plan has not been fully achieved, partly due to insufficient funding. Feet First – Part completed - Progressively implement the measures contained in the "Feet First" and Thanet Cycling Plan to improve safety/security for pedestrians and cyclists.
Work with rail operator to improve safety/security	Ongoing	See section 8	Part completed - Work with the rail operator to improve safety and security on and around Thanet's rail stations and on board trains.
Work with bus operators to improve safety/security	Ongoing	See sections 7 and 19	Completed - Working with commercial bus operators and Thanet Community Transport to improve safety/security on buses.
Safety audit of bus stops	2006-7 onwards	LTP and Officer time	Completed – "safety audit" of bus stops carried out to identify any improvements in location, street lighting, etc. to improve safety for bus passengers.
Implement and promote 'Manston Rides' project	2005-6	LTP/developer	Not completed. Local public right of way and permissive paths maintained and explored for expansion through new development
Identify a further network of riding routes	2005 onwards	Officer time	Not completed. - Identify a further network of on and off road routes.
Implement speed reduction measures	Ongoing	See section 16	Not completed - Implement speed reduction measures on appropriate rural roads used by riders.

Appendix B
Policy Context

National Policy

National Planning Policy Framework (July 2018):

The revised NPPF carries forward many of the principles relating to planning and transport that were present in the previous version:

It says that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

a) the potential impacts of development on transport networks can be addressed;

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

The guidance states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Planning policies should be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils. Where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development should be identified and protected.

The NPPF also addresses car-parking standards and says that these should take into account:

a) the accessibility of the development;

b) the type, mix and use of development;

c) the availability of and opportunities for public transport;

d) local car ownership levels; and

e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.

Local Policy

Thanet Local Plan

The District Council is preparing a new Local Plan to guide development and investment in the district over the period to 2031. This plan will establish the level of growth in the district over that period including the amount of new homes and job creating development to be planned for. It will also identify where development should take place and make appropriate land allocations.

In promoting sustainable development, the new Local Plan will need to take account of Thanet's existing settlement pattern and transport links which have established over a considerable time. It will also need to take account of or review as appropriate land allocations made in the previous Local Plan. For example that Plan allocated land for 1,000 new homes at Westwood, and following grant of planning permission that development is expected to start shortly.

The draft Local Plan allocates land for 17,140 dwellings at different locations across the district, and retains key employment sites, including Manston Business Park and parts of the EuroKent Business Park from the previous Local Plan.

Appendix C
Infrastructure Proposals

Type	Description	Reason	Potential Funding Source	Cost*
Road	Create New Road Link Between A28 Brooksend Hill and Minnis Road.	To manage congestion at Birchington Square and offer alternative routes to Birchington seafront areas improving Air Quality	(S38)(S106)	On Site
Road	Create New Road link between A28 Brooksend Hill and Acol Hill/B2050.	To manage traffic congestion at Birchington Square and A28 Corridor and form the start of major new road corridor to Westwood	On Site (S38)(S106)	On Site
Road	Widen B2050 Manston Road between junction with Acol Hill and Shottendane Road.	To manage traffic congestion at Birchington Square and A28 Corridor and form the start of major new road corridor to Westwood	On Site (S38)(S106)	£5,000,000
Road	Widen / provide necessary localised Improvements to Shottendane Road as far as the vicinity of Firbank Gardens	To manage traffic congestion at Birchington Square and A28 Corridor and form the start of major new road corridor to Westwood.	S106 / External	£15,000,000
Road	Create new road link between Shottendane Road / Manston Road. Close off Shottendane Road at junction with Manston Road.	To manage traffic congestion at Birchington Square and A28 Corridor and form the start of major new road corridor to Westwood Avoiding Coffin House Corner Junction	On Site (S38)(S106)	On Site
Road	Create new road link between Manston Road and Nash Road behind Salmestone Grange and close off Nash Road at its junction of Coffin House Corner.	To manage traffic congestion in locality and form the start of major new road corridor to Westwood Avoiding Coffin House Corner Junction	On Site (S38)(S106)	On Site
Road	Reconfigure Coffin House Corner Signal Junction. Close off Nash Road Arm and improve capacity and pedestrian facilities.	To reduce journey time / congestion whilst providing safer access for children walking to school	S106 / S278	£500,000
Road	To reconfigure roundabout at Queens Avenue/Tivoli Road/Grosvenor Gardens and introduce one-way flow on Queens Avenue	To improve safety at junction and facilitate re-routing of tourist traffic bound for Seafront and Margate Old Town	S106	Completed
Road	Marine Terrace Public Realm Improvements (only if funded externally)	Environmental / regeneration - Improve pedestrian environment	External Funding	£16,000,000
Road	To re-route tourist traffic away from Margate seafront, by providing junction improvements and potentially reintroducing two way flow to Tivoli Road.	To manage traffic congestion at Clock tower junction and reduce journey times	S106 / CIL	£3,000,000

Type	Description	Reason	Potential Funding Source	Cost*
Road	Reconfigure Victoria Traffic Signal junction	To manage journey times and relieve congestion	S106 / CIL	Nominal
Road	Widen Nash Road along its existing alignment to new LDR Standard	To manage traffic congestion on A254 Corridor by facilitating major new road corridor to Westwood Avoiding Coffin House Corner Junction	S278 / 38 On Site	On Site
Road	Connect Enterprise Road to Nash Road	To provide access to employment and retail destinations, and to manage traffic impact at Westwood and Victoria Traffic signals	S278 / 38 / S106	£1,000,000
Road	Upgrade Tesco internal link road to adoptable standard between Westwood Road and Margate Road. Extend Millennium Way to New Link Road	To relieve Westwood roundabout and A256 Westwood Road Corridor for journeys between Ramsgate and Broadstairs	External Funding	£8,000,000
Road	Create new road between Toby Carvery Roundabout (A256) and B2050 (Across Northern Grass within Manston Airport site) to provide relief to Haine Road Corridor. Improve approach and roundabout at Westwood Cross to increase capacity	To provide enhanced access to Westwood, manage congestion and relieve the A256 Haine Road Corridor.	S106 / Part on Site	£12,000,000 (Off site Section)
Road	Improvements Spitfire junction.	To manage safety at this junction	S278	£1,000,000
Road	To extend Columbus Avenue to Manston Road Birchington.	Improve road capacity to meet increased surface transport movements associated with future development.	S106 / External	£10,000,000
Road	Improvements to Dane Court Road / Westwood Road Junction to improve journey time reliability.	To manage traffic congestion on the A256 / A255 road corridors	CIL / S106	£1,000,000
Road	To investigate High Street, St. Lawrence/ Newington Road junction to improve air quality and address congestion.	To manage congestion improve Air Quality (Signage Scheme)	S106	£50,000
Road	New Link Road through Manston Green Site and Junction improvements at Manston Road / Haine Road Roundabout	To provide access to development site and manage congestion on the A256 Haine Road Corridor	S106 / External	£3,000,000

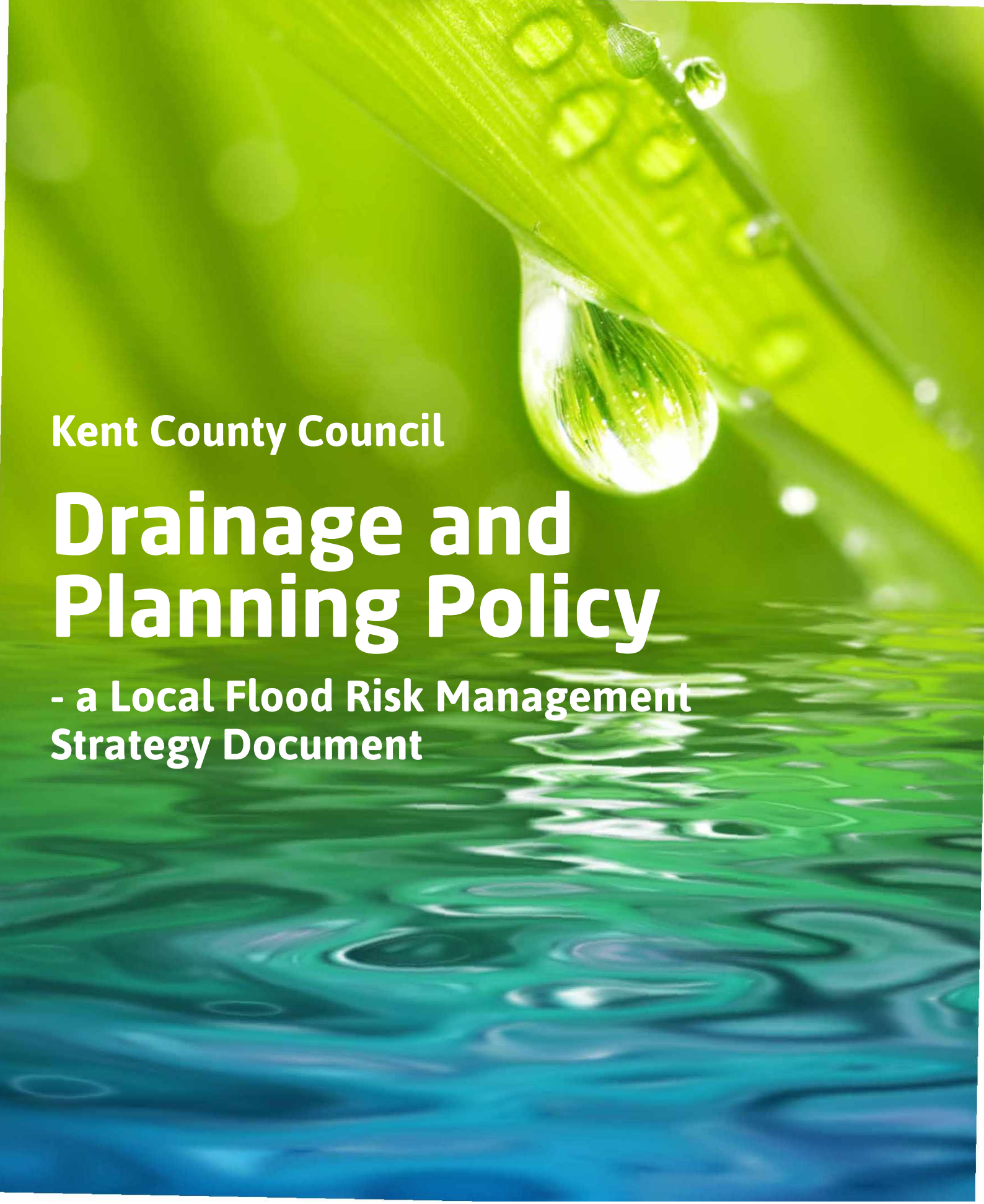
Type	Description	Reason	Potential Funding Source	Cost*
Cycle	Creation of a New Shared Cycleway on the A28 Between Birchington & Garlinge	To connect new communities and provide access to secondary schools.	S106 / CIL / LTP	TBC
Cycle	Improvements to Westwood main junction and adjacent roads to improve bus and cycle provision and improve accessibility and movement for pedestrians between different areas of Westwood Town Centre	To provide better bus access and a more walkable town centre.	S106 / CIL / LTP	TBC
Cycle	Construct shared facility on Sloe Lane, Margate.	Improve sustainable transport links between Dane Valley and Westwood to encourage cycle use.	S106 / CIL / LTP	TBC
Cycle	Create shared facility on existing path to the R/O Bromstone School, Broadstairs to connect to Millennium Way to offer alternative to cycling on Rumfields Road.	Improve sustainable transport links between Broadstairs and Westwood to encourage cycle use for retail, leisure and education trips.	S106 / CIL / LTP	TBC
Cycle	Create shared facility on existing footpath between Ramsgate Road, Broadstairs and Dumpton Park Drive, Broadstairs to the side of former Holy Cross School.	Improve cycle links to East Kent College	S106 / CIL / LTP	TBC
Cycle	From Ramsgate Railway Station create shared facility on existing footpath to Newington Road.	Improve cycle links to Ramsgate Station for surrounding residential catchments	S106 / CIL / LTP	TBC
Cycle	From east of Ramsgate Railway Station create shared facility on existing path to Margate Road, provide crossing facility to access Newlands Road and create link to Pysons Road using Newlands Lane.	Provide better linkage between local schools and Ramsgate Rail Station.	S106 / CIL / LTP	TBC
Cycle	Off road section between Convent Road, Broadstairs and the existing off road shared facility further along Joss Gap Road (on edge of golf course).	To complete missing section of Viking Coastal Trail - Improve attractiveness of this route and safety.	S106 / CIL / LTP	TBC
Cycle	Between Dent-de-Lion Road, Garlinge and Park Road, Birchington creating shared facility on existing public rights of ways.	Provide better cycle access / connectivity between new development site and wider PROW network.	S106 / CIL / LTP	TBC
Cycle	Creation of shared facility on south east side of Dane Park, Margate to link Dane Valley cycle route with Northdown Road, via St Dunstan's Avenue.	Improve cycle access to Dane Park and Retail and residential destinations in Cliftonville	S106 / CIL / LTP	TBC

Type	Description	Reason	Potential Funding Source	Cost*
Cycle	Creation of a shared facility between Canterbury Road West, Ramsgate and Canterbury Road East using existing bridge facility to the east of Haine Road and north of Canterbury Road East.	To link Cliffsend to wider highway network. Improve access to Mixed use development on Former Manston Airport Site	S106 / CIL / LTP	TBC
Cycle	Provide missing shared facility on SW side of St Peter's Road between Broadley Road and Lister Road, Margate.	Improve Cycle links between Broadstairs including QEQM Hospital	S106 / CIL / LTP	TBC
Cycle	Provide new shared facility between Durlock and Sevenscore as alternative to Grinsell Hill/ The Lanes/Foxborough Lane.	Provide enhanced connectivity between Minster and Cliffsend to future Thanet Parkway Station	S106 / CIL / LTP	TBC
Cycle	Upgrade footpath TM31 to bridleway to link to bridleway TE12A & link to Shottendane Road improvements to provide shared use pedestrian cycle route.	Provide better connectivity between development settlements	S106 / CIL / LTP	£165,000
Cycle	Improvement of Bridleway TM22 surface to width of 3m as part of Garlinge development.	Link Garlinge and Strategic Allocations to wider highway network	S106 / CIL / LTP	£79,000
Cycle	Upgrade Footpath TM14 on edge of development to Bridleway.	Link Garlinge and Strategic Allocations to wider highway network	S106 / CIL / LTP	£61,000
Cycle	Provide improved surface and widen Bridleway TM11	Link Garlinge and Strategic Allocations to wider highway network	S106 / CIL / LTP	£89,000
Cycle	Provide improved surface and widen Bridleway TM16	Link Garlinge and Strategic Allocations to wider highway network	S106 / CIL / LTP	£140,000
Cycle	Upgrade Footpath TR24 to Bridleway —Crossing point required on Manston to Haine Road Link.	To Provide linkage between allocation sites and Westwood	S106 / CIL / LTP	£208,000
Cycle	Upgrade Footpath TR9 to Bridleway	To Link Former Manston Airport allocation to Manston Green and wider Highway network	S106 / CIL / LTP	£46,000
Cycle	Improve surface of Bridleway TR8 and widen to 3m	To Link Former Manston Airport allocation to wider highway network including Manston to Haine Road	S106 / CIL / LTP	£132,000
Cycle	Creation of new Bridleway and Improve TR32 to link development to future Parkway Station	To provide linkage between development site and Parkway Station	S106 / CIL / LTP	£98,000
Cycle	Improve surface of Bridleway TR10 and widen to 3m	To Link Former Manston Airport allocation to Manston Green and wider Highway network	S106 / CIL / LTP	£143,000

Type	Description	Reason	Potential Funding Source	Cost*
Rail	Thanet Parkway – New station with 300 parking spaces to be located at Cliffsend	To relieve parking problems around existing stations and to serve future needs of Local Plan growth Discovery Park directly	External (LGF) Private Funding	£21,400,000

*It should be noted that all infrastructure costs are considered draft at this stage and will be subject to change as projects are refined/progressed.

This page is intentionally left blank



Kent County Council

Drainage and Planning Policy

- a Local Flood Risk Management Strategy Document

December 2019

Kent County Council kent.gov.uk

Table of contents

1 Role of this Policy 3

2 Introduction 5

2.1 Background 5
2.2 Legislative Framework 6
2.3 Sustainable Drainage in Planning 7
2.4 Design Strategies 7
2.5 Strategic Consultation 7

3 Planning policy and guidance for drainage 8

3.1 NPPF 8
3.2 Water Environment Regulations 2003 9
3.3 Habitats Regulation 2017 10
3.4 Defra's 25-Year Environment Plan 10
3.5 Non-statutory technical standards for sustainable drainage 10
3.6 Local Authority Guidance 11

3.6.1 Local Plans and Neighbourhood Plans 11
3.6.2 Supplementary planning documents 11
3.6.3 Strategic Flood Risk Assessments (SFRA) 11

3.7 Kent County Council Guidance 12

3.7.1 Water. People. Places – a guide for master planning sustainable drainage into developments 11
3.7.2 Kent Design Guide Technical Appendices: Making It Happen 11
3.7.3 Land Drainage Policy 11
3.7.4 Surface Water Management Plans 11
3.7.5 Kent Environment Strategy 12

3.8 Other Guidance & Tools 13

3.8.1 CIRIA SuDS Manual (C753), 2015 13
3.8.2 Building Regulations 13
3.8.3 BS 8582:2013 Code of practice for surface water management for development sites 13
3.8.4 UK Sustainable Drainage Guidance 14
3.8.5 Long Term Flood Risk Information 14

4 Drainage Consultation 15

4.1 Introduction 15

4.2 Consultation Process 16

4.2.1 Overview 16
4.2.2 Pre-application Advice 16
4.2.3 Planning application submission 17

4.3 Consultation Submission Requirements 18

4.3.1 Introduction 18
4.3.2 Large scale development 20
4.3.3 Consultation for minor and low risk development 21

4.3.4 Easements and way leaves 21
4.3.5 Maintenance and verification 21
4.4 Adoptable highways and drainage 23

5 Policies for Sustainable Drainage 23

5.1 Introduction 23
5.2 Drainage policies 24
5.2.1 SuDS Policy 1: Follow the drainage hierarchy 24
5.2.2 SuDS 2: Deliver effective drainage design 27
5.2.3 SuDS Policy 3: Maintain Existing Drainage Flow Paths & Watercourses 31
5.2.4 SuDS Policy 4: Seek to Reduce and Avoid Existing Flood Risk 33
5.2.5 SuDS Policy 5: Drainage Sustainability and Resilience 35
5.2.6 SuDS Policy 6: Sustainable Maintenance 37
5.2.7 SuDS Policy 7: Safeguard Water Quality 39
5.2.8 SuDS Policy 8: Design for Amenity and Multi-Functionality 41
5.2.9 SuDS Policy 9: Enhance Biodiversity 43

Glossary 45
Appendix A. National Planning Policy Framework (Extract) 48
Appendix B. Non-Statutory Technical Standards for Sustainable Drainage 50
Appendix C. Drainage Strategy Summary Form 51
Appendix D: Drainage Asset Record Sheet for Verification Report 54

Date	Revisions details
October 2016	Clarification on technical matters; submission summary form.; pre-application advice; post-construction verification reports; standard advice.
June 2017	Further clarification of technical matters and amendments to general wording including revised M5-60, 50% reduction for brownfield sites, runoff control per soil type, discharge to highway systems, off-site drainage improvements and developer contributions.
November 2019	Clarification of drainage submission requirements and revised drainage policies to reflect latest changes in NPPF and include the requirements for a verification report and any changes as a result of consultation.

The overall policy will be assessed biennially and reviewed when National policy or other relevant policy changes occur.

1 Role of this Policy

This policy sets out how Kent County Council (KCC), as Lead Local Flood Authority (LLFA) and statutory consultee, will review drainage strategies and surface water management provisions associated with applications for major development. It is consistent with the Non-Statutory Technical Standards for Sustainable Drainage (as published by Defra in March 2015) and sets out the policy requirements KCC has for sustainable drainage. It should be read in conjunction with any other policies that promote sustainable drainage, specifically:

- the National Planning Policy Framework and,
- any specific policy set out by the relevant Local Planning Authority

This policy is also supported by KCC guidance and policy provided in:

- Kent Design Guide Technical appendices ('Making It Happen') 2019;
- Water. People. Places - a guide for Masterplanning sustainable drainage in developments;
- KCC Land Drainage Policy

The aim of this policy document is to clarify and reinforce these requirements. It also includes references to other design considerations which impact sustainable drainage design and delivery.

This policy should be used by:

- developers when considering their approach to the development of new sites or redevelopment of brownfield sites;
- developers or their consultants when preparing submissions to support a planning application for major development;
- professionals involved in developing drainage schemes including engineering and urban and landscape professionals;
- development management officers when considering development applications,
- Local Authorities when developing local planning and land-use policy.

With this current update, we seek to ensure that multifunctionality of open space is now emphasised within development master planning. This provides an opportunity for Kent to look to wider benefits of sustainable drainage and strengthen policies for the delivery of drainage systems which are fully sustainable, thus providing quantity control, quality improvement, biodiversity enhancement and amenity. Changes to the National Planning Policy Framework (NPPF) in 2019 and Defra's 25-Year Environmental Plan[1] promote a robust approach to sustainable development.

[1]25-year Environment Plan, published January 2018 on www.gov.uk/government/publications/25-year-environment-plan

2 Introduction

2.1 Background

KCC was made a LLFA for Kent by the Flood and Water Management Act 2010 (the Act). As LLFA, KCC has a strategic overview of 'local flooding'. Local flooding is defined by the Act as flooding which is caused by:

- Surface water,
- Groundwater,
- Ordinary Watercourses

The management of surface water within new development is a key factor in managing local flooding.

Since commencement of the Act in 2010, the Government has assessed various means of promoting sustainable drainage systems. In April 2015, LLFAs were made statutory consultees in planning for surface water. Our understanding of local drainage and local flood risk presents a strong platform from which to provide advice and guidance to Local Planning Authorities on the management of surface water.

In undertaking this role KCC coordinates with the 12 local authorities as well as Kent's own planning department and the Ebbsfleet Development Corporation. Where appropriate we will also liaise with other relevant flood risk management authorities, such as the Environment Agency, sewerage undertakers and the county's Internal Drainage Boards (IDB).

2.2 Legislative Framework

As a LLFA within Kent, KCC is required under Article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 ('the Development Management Procedure Order') to provide consultation response on the surface water drainage provisions associated with major development.

Major development is defined within the Development Management Procedure Order as development that involves any one or more of the following:

(a) the winning and working of minerals or the use of land for mineral-working deposits;
(b) waste development;
(c) the provision of dwelling houses where:
    (i) the number of dwelling houses to be provided is 10 or more; or
    (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
(d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
(e) development carried out on a site having an area of 1 hectare or more.

As a statutory consultee, KCC must provide a substantive response within 21 days of consultation (Article 22 of the Development Management Procedure Order). A substantive response is one which:

(a) states that the consultee has no comment to make;
(b) states that, on the basis of the information available, the consultee is content with the development proposed;
(c) refers the consultor to current standing advice by the consultee on the subject of the consultation; or
(d) provides advice to the consultor.

The Planning and Compulsory Purchase Act 2004 describes the duty to respond as a consultee, including the duty to report to the Secretary of State on compliance with the provision of substantive responses.

The Town and Country Planning (General Development Procedure Amendment No. 2, England) Order 2006 introduces the concept of Critical Drainage Areas as *"an area within Flood Zone 1 which has critical drainage problems and which has been notified [to] the local planning authority by the Environment Agency".* However, no Critical Drainage Areas have yet been defined within Kent and will not require further consultation.

2.3 Sustainable Drainage in Planning

Sustainable drainage systems are designed to control surface water as close to its source as possible. Wherever possible they should also aim to closely mimic the natural, pre-development drainage across a site. A well-designed sustainable drainage approach also provides opportunities to:

- reduce the causes and impacts of flooding;
- remove pollutants from urban run-off at source;
- combine water management with green space with benefits for amenity, recreation and wildlife.

The purpose of the planning system is to contribute to the achievement of sustainable development and deliver the requirements of the National Planning Policy Framework (NPPF). The use of sustainable drainage systems helps to achieve the sustainability objectives of the NPPF.

2.4 Design Strategies

Development has the potential to change surface water and ground water flows, depending upon how the surface water is managed within the development proposed. Planning applications for major development should therefore be accompanied by a site-specific drainage strategy that demonstrates that the drainage scheme proposed is in compliance with KCC's sustainable drainage policies, as outlined within this document.

The drainage strategy must also demonstrate that the proposed surface water management proposal is consistent and integrated with any other appropriate planning policy and flood risk management measures that are required.

2.5 Strategic Consultation

As a LLFA, KCC has a consultation role in relation to the preparation of local plans, neighbourhood plans, strategic flood risk assessments and other planning instruments produced by Local Planning Authorities[2].

KCC will provide advice and guidance on local flood risks and appropriate policy for any area upon request.

KCC will also provide information to individuals and other organisations with respect to drainage and local flood risk for use in the preparation of other relevant planning documents upon request.

[2] National Planning Policy Guidance, Flood Risk and Coastal Change, paragraph 2.

3 Planning policy and guidance for drainage

This section sets out the sources of planning policy relevant to the management of surface water. These policies will form the basis of KCCs assessment of any submitted drainage strategy. The drainage strategy will need to demonstrate how the development meets these requirements.

3.1 NPPF

The National Planning Policy Framework (NPPF) was published on 27 March 2012 with further revisions in 2019; it sets out the Government's planning policies for England and outlines how these are expected to be applied. Planning law requires that applications for planning permission must be determined in accordance with the relevant Local Planning Authority's development plan, following public consultation and with due regard for other material considerations.

The NPPF is a material consideration in the determination of planning applications. At the heart of the NPPF is a presumption in favour of sustainable development, excepting where adverse impacts significantly outweigh the benefits (or where specific policies indicate that development should be restricted). Flooding and drainage may also be considered material considerations in the determination of planning applications as their management contributes to sustainable development.

Paragraphs 155, 157, 163, 165 and 170 of the NPPF (Appendix A) have particular relevance to flooding and drainage. These paragraphs include consideration for area of flood risk, incorporation of sustainable drainage systems, taking account of advice from LLFA, operational standards, maintenance requirements and multifunctionality.

The NPPF is supported by the **Planning Practice Guidance**[3] which provides further advice on how planning can take account of the risks associated with flooding in plan-making and the application process.

3.2 Water Environment Regulations 2003

The Water Environment Regulations 2003 make provision for the purpose of implementing in river basin districts the Water Framework Directive (Directive 2000/60/EC of the European Parliament) which established a framework for Community action in the field of water policy. These regulations will remain in place until such time that UK law is revised to reflect changes in EU membership. These Regulations require a new strategic planning process to be established for the purposes of managing, protecting and improving the quality of water resources[4].

Therefore, this provides an opportunity to plan and deliver a better water environment, focusing on ecology. The WFD aimed for the water environment to reach 'good' chemical and ecological status in inland and coastal waters by 2015. Planning and programmes are continuing in six year cycles until 2027.

The WFD drives water quality improvement planning along total river catchment areas, with the production of River Basin Management Plans. The directive puts a duty on public bodies to have regard to river basin management plans (and associated supplementary plans) when exercising their functions where it may affect a river basin district.

Controlling water is inherent in the WFD's objectives, as uncontrolled surface flow or flooding can cause unmanageable water quality problems. Sustainable drainage principles are key to meeting the objectives of the WFD in its continuing cycles.

3.3 Habitats Regulation 2017

The Conservation of Habitats and Species Regulations 2017 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive[5]), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales.

The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites.

Under the Regulations, competent authorities i.e. any Minister, government department, public body, or person holding public office, have a general duty, in the exercise of any of their functions, to have regard to the EC Habitats Directive and Wild Birds Directive.

The sites where habitats and species are legally protected due to their exceptional importance are known as Natura 2000 sites; this network protects rare, endangered or vulnerable habitats and species. The Natura 2000 network includes Special Areas of Conservation (SACs, identified under the Habitats Directive), Special Protection Areas (SPAs, identified under the Birds Directive) and Ramsar sites (wetlands of international importance designated under the Ramsar Convention). All Natura 2000, or 'European', sites are also classified as Sites of Special Scientific Interest (SSSIs) but not all SSSIs are Natura 2000 sites.

---

[3] The Planning Practice Guidance is a web-based resources which can be accessed from the Planning Portal at: http://planningguidance.planningportal.gov.uk/?s=Drainage&post_type=guidance

[4] This framework became UK law in December 2003

[5] More information on the Habitats Directive can be found at: http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

3.4 Defra's 25-Year Environment Plan

The 25 Year Environment Plan was published in January 2018; it sets out government action to tackle the growing problems we face in the environment and aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species, reduce risk of environmental hazards and promote sustainable development.

The plan is supported by the concept of natural capital, meaning it places value on natural assets, which includes geology, soils, water and all living organisms. Specific components of the Environment Plan are introduced in current updates of the NPPF.

The Environment Plan will need to be underpinned by law and enforced by a new legal framework for the environment to replace the system the EU currently provides. It is beneficial to be aware of the changes in legislation and policy indicated in this plan as it provides government direction to sustainable development.

3.5 Non-statutory technical standards for sustainable drainage

To support the LLFAs statutory consultee role, Defra published the 'Non-Statutory Technical Standards for Sustainable Drainage Systems' on 23 March 2015. These standards provide advice and guidance for the design, maintenance and operation of sustainable drainage systems[6].

Further guidance on the application of the Non-Statutory Technical Standards will be provided by Defra and associated stakeholders.

A summary of the requirements of these non-statutory standards in provided in Appendix B. The policies in this policy are consistent with the Non-Statutory Technical Standards.

3.6 Local Authority Guidance

Local Planning Authorities are ultimately responsible for determining planning applications and have numerous planning and policy documents to support the delivery of sustainable development within their districts.

3.6.1 Local Plans and Neighbourhood Plans

National planning policy places Local Plans at the heart of the planning system. Local Plans set out a vision and a framework for future development of the area. Local Plans should be based upon and reflect the presumption in favour of sustainable development. They should also address housing provision, the economy, community infrastructure and environmental issues such as adapting to climate change and ensuring high quality design.

The management of flood risk and surface water can be dealt with through policies for sustainable construction, flood risk, open space, landscape character and green infrastructure. These policies may be supported by further Supplementary Planning Documents or guidance notes.

Neighbourhood planning is a right for communities introduced through the Localism Act 2011. Parish Councils and Neighbourhood Forums (where there is no Parish Council) and their communities can shape development in their areas through the production of Neighbourhood Development Plans. These plans become part of the Local Plan and the policies contained within them are then used in the determination of planning applications.

Any drainage strategy should make reference to relevant Local Plan and Neighbourhood Plan policies. It may also have to provide evidence which supports delivery of biodiversity, amenity and other benefits.

3.6.2 Supplementary planning documents

Some local authorities in Kent have specific drainage guidance, policies and standards for development within their district areas, which may include specific surface water discharge rates. Other local authorities may introduce similar guidance. These documents provide substantive guidance on how drainage should be delivered.

3.6.3 Strategic Flood Risk Assessments (SFRA)

Strategic Flood Risk Assessments are required to inform the development of Local Plans, as stated within the NPPF. A SFRA assesses the risk to an area from flooding from all sources, taking into account the effects of predicted climate change. They should also assess the impact that land use changes and development will have on flood risk within the district in question. Each Local Planning Authority in Kent has prepared and referenced a SFRA within their planning documents. These documents provide key information on the potential sources and magnitude of flooding and may provide information for specific site allocations.

---

[6] The Non-statutory Technical Standards are published at: https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards

3.7 Kent County Council Guidance

The Local Flood Risk Management Strategy (the Local Strategy) for Kent sets out a countywide strategy for managing the risks from local flooding. One of the five objectives set out in the Local Strategy specifically states the importance of 'ensuring that development in Kent takes account of flood risk issues and plans to effectively manage any impacts'.

To support delivery of this objective, KCC has developed guidance to define the approach to planning and design of drainage. When considering surface water drainage within new developments in Kent, it is therefore recommended that reference is made to specific guidance and wider information available:

3.7.1 Water. People. Places – a guide for masterplanning sustainable drainage into developments

This guidance outlines the process for integrating sustainable drainage systems into the masterplanning of large and small developments[7]. This guidance should be used as part of the initial planning and design process for all types of development, with specific reference made to the relevant development typologies.

3.7.2 Kent Design Guide Technical Appendices: Making It Happen

The Kent Design Guide was produced to ensure that all new development results in vibrant, safe, attractive, liveable places. 'Making It Happen' comprises technical appendices that provide advice and guidance on the design and construction of drainage systems which KCC may be adopting.

The sustainability chapter (drainage systems) has been revised in May 2019 and contains specific technical guidance for drainage design.

3.7.3 Land Drainage Policy

KCC has powers under Section 23 of the Land Drainage Act 1991 to consent works in an ordinary watercourse and to enforce the removal of unconsented works.

Land Drainage regulations are generally concerned with the physical condition of watercourses, including whether they are blocked or how they are modified, including the introduction of new structures to them. This policy sets out how Kent County Council exercises these land drainage functions.

3.7.4 Surface Water Management Plans

Surface Water Management Plans (SWMPs) have been prepared by KCC (in partnership with other relevant stakeholders) to identify specific local actions to manage local flood risk. They have been undertaken in areas which were identified as a potential risk from local flooding in the Preliminary Flood Risk Assessment. These studies may provide a greater understanding of the current flood risk. Any proposed development should include consideration of any findings and recommendations of the relevant SWMP for the area. The areas covered by SWMPs are regularly being updated and can be found on the KCC website[8].

3.7.5 Kent Environment Strategy

As part of a county wide partnership, KCC has produced a Kent Environment Strategy– A strategy for environment, health and economy (KES) setting out how Kent and their partners propose to address significant opportunities and challenges from environmental change and development pressures (such as a need for improved air and water quality, decline in biodiversity and the impacts of climate change)[9]. It is accompanied by an implementation plan and includes partnership actions that will deliver against the priorities set out in the strategy. KCC adopted the strategy in January 2016 and has invited the District Councils to also adopt it to provide a basis for co-ordinated action.

The KES recognises that the environment is a key part of the infrastructure supporting the Kent economy. The strategy aims to make the most of environmental opportunities whilst addressing challenges arising from development pressures, need for improved air and water quality, decline in biodiversity and the effects of climate change.

3.8 Other Guidance & Tools

In approaching or reviewing design, technical aspects may need clarification and specification in order to satisfy KCC that it meets the required standard. KCC will make reference to good practice presented within the following documents, and would recommend that any designer also refers to:

3.8.1 CIRIA SuDS Manual (C753), 2015

This guidance document provides comprehensive information on the all aspects of the life cycle of sustainable drainage from initial planning, design through to construction and management including landscaping, waste management and costs.

3.8.2 Building Regulations

Building Regulations exist to ensure the health, safety, welfare and convenience of people in an around buildings. Part H of the Building Regulations specifically covers drainage. The consultation with the LLFA addresses flood risk to and from developments and does not replace any requirement for Building Regulation approval.

3.8.3 BS 8582:2013 Code of practice for surface water management for development sites

The British Standard gives recommendation on the planning, design, construction and maintenance of surface water management systems for new development and redevelopment sites in minimizing and/or mitigating flooding and maximizing the social and environmental benefits.

---

[7] The document can be found at: www.kent.gov.uk/waste-planning-and-land/flooding-and-drainage/sustainable-drainage-systems

[8] SWMPs can be found at: www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/flooding-and-drainage-policies/surface-water-management-plans

[9] The Strategy can be found at: http://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/environmental-policies/kent-environment-strategy

3.8.4 UK Sustainable Drainage Guidance

The UK SuDS Tools website which provides estimation tools for the design and evaluation of surface water management systems. The website has been developed and is supported by HR Wallingford. The web site can be accessed at: https://www.uksuds.com/ .The website provides estimations for greenfield runoff, storage analysis and other tools.

3.8.5 Long Term Flood Risk Information

In 2013 the Environment Agency, working with LLFAs, produced the Long Term Flood Risk map, which depicts the risk associated with surface water flooding. The Risk of Flooding from Surface Water maps show flooding scenarios as a result of rainfall with the following chance of occurring in any given year (annual probability of flooding is shown in brackets): 1 in 30 (3.3%), 1 in 100 (1%), and 1 in 1000 (0.1%).

The Risk of Flooding from Surface Water map is published on the Gov.UK website on the "Long Term Flood Risk Information". This mapping is key to assessing overland flow routes and to identifying any locations at high risk of surface water flooding.

4 Drainage Consultation

4.1 Introduction

A drainage strategy should be submitted to the relevant Local Planning Authority along with any planning application for major development. It may either form part of a wider Flood Risk Assessment, or it can be submitted as a separate and dedicated standalone document.

Whilst consultation is not undertaken with KCC for minor development, applicants should be aware that the NPPF priorities for sustainable drainage do apply to all development, irrespective of scale (NPPF, Paragraph 163). Developers of sites for minor development are encouraged to consider the policies outlined in this document, as well as any local specific policy with respect to site drainage design. Applicants for these smaller developments are directed to guidance and standing advice on best practice to help minimise flood risk.

It is important that any consultation request we receive reflects the level of risk to a site (or the risk that may result from its development). Consequently, consultation may also occur for development, other than major development in areas of higher local flood risk, as described in Section 4.3.

Consultation on flood risk will also occur with other risk management authorities. For example, the management of tidal and fluvial flood risk and the prevention of inappropriate development in the associated flood-plain remains the responsibility of the Environment Agency. The Environment Agency is also responsible for the management of permitting regulations which may affect discharge to water bodies or the ground. Similarly, if any drainage scheme requires connection to a public sewer, additional approval will be required from the appropriate sewerage undertaker.

Within Flood Zones 2 or 3 (areas of medium/high tidal or fluvial flood risk), a Drainage Strategy should be a component of a wider Flood Risk Assessment and should outline how the management of runoff will not exacerbate the existing flood risk to/from the development proposed.

A Flood Risk Assessment should also be submitted with any application for planning permission on sites in excess of 1 ha in Flood Zone 1 (low flood risk); in these instances the Flood Risk Assessment/Drainage Strategy should be primarily concerned with the management of surface water within the proposed development site.

Other third parties, including but not limited to the Environment Agency, IDB, The Highways Authority, the Sewerage Undertaker and adjacent landowners, could have an effect on the design of a drainage system. Consultation with relevant third parties is essential early in the design process. This information should be provided as part of the consultation process.

4.2 Consultation Process

4.2.1 Overview

Consultation with KCC will occur through the planning process. KCC will be notified of the submission of a major planning application by the Local Planning Authorities within Kent (as defined in Section 2.5).

A substantive response to the LPA is legally required from KCC within 21 days of consultation.

4.2.2 Pre-application Advice

Incorporating appropriate drainage is easier and more sustainable if it is planned and designed in from the start of a development. KCC encourages pre-planning consultation to ensure that the issues are appropriately addressed at an early stage.

Pre-planning advice from KCC can provide the following benefits:

- background information to identify constraints and matters in relation to flood risk and drainage pertinent to the application;
- an indication of whether a proposal would be acceptable in principle, saving time and cost within the planning process;
- reduced time to prepare the proposal;
- provides clarification of the guidance and policies that will be applied to the development proposal;
- identifies whether specialist input is required; and,
- identification and engagement of other key stakeholders.

KCC's pre-application planning advice in relation to new development is discretionary and is provided as a chargeable service. Details and forms for pre-application advice is found on kent.gov.uk. Standing advice for specific development scenarios and types is also available on Kent's website[10].

We provide free advice to:

- individual homeowners who have specific drainage or flood related issues which may impact their own house for development; and,
- Parish councils, Local community groups, or Flood Forums on works proposed to improve local communities.

4.2.3 Planning application submission

The Local Planning Authority will confirm that a Drainage Strategy has been submitted with the planning application and pass it to KCC for consultation. KCC will review the submitted material for adequacy and, depending upon the submission, may request further information. This will be communicated to the applicant via the Local Planning Authority.

The drainage strategy submitted to support a planning application must reflect the development proposal (including site area, type of development, general arrangement and layout).

All elements of the proposed drainage strategy should be within the defined planning and development application boundary as defined by the development's "red-line" boundary. This ensures that planning approval and any subsequent conditions will apply to the entirety of the drainage measures. It would not be acceptable to have any drainage measures, most notably attenuation basins or soakaways outside of the planning application site boundary unless secured by other planning conditions, approvals or agreements.

In reviewing a drainage application, KCC will, in the first instance, confirm compliance with this policy, national planning policy (as defined in the NPPF), and compliance with the Non-Statutory Technical Standards. Local planning requirements (as set out in Local Plans or other local planning documents) and other site-specific land-use factors that affect surface water management will also be referenced, where appropriate. Additionally, KCC will consider adherence to wider environmental principles of the NPPF that may have a bearing on drainage design (for example, water quality, biodiversity and amenity).

A consultation response will be prepared and returned to the Local Planning Authority within the required 21 days following receipt of a suitably detailed submission. The consultation response may result in a request for further information or for planning conditions for subsequent determination.

[10] www.kent.gov.uk/waste-planning-and-land/flooding-and-drainage/sustainable-drainage-systems#tab-3

4.3 Consultation Submission Requirements

4.3.1 Introduction

Detailed information will be required to demonstrate that a drainage design is appropriate and will operate effectively. This information may be required for all drainage measures, including (but not limited to) pipe networks, attenuation features, ponds, soakaways and control structures.

Key design information must be evidenced and assessed. Key information which may be needed to demonstrate the feasibility or applicability of a design philosophy includes:

- existing discharge rates and post development discharge rates;
- ground investigation information, groundwater levels and infiltration rates;
- condition and connectivity surveys of receiving watercourses and sewers;
- ground level and topographical survey;
- deliverability of discharge destination and right to connect.

Detail of this technical information is provided in Chapter 6 of Making it Happen C2: Sustainable Drainage Systems. The lack of detailed technical information may increase the level of uncertainty we may have about the effectiveness of a drainage strategy. If the degree of uncertainty is great, this is that the proposal cannot clearly demonstrate a functioning system in line with requirements, then KCC will have grounds to object to the drainage proposal or may delay return of a substantive comment to the planning authority.

We therefore encourage pre-application discussion to identity any areas which may need further investigation or clarification to reduce any uncertainty with respect to the functioning of the system.

The detail provided in the submission will reflect the type of planning application submitted, whether 'outline' (Surface Water Management Strategy) or 'full' (Detailed Drainage Strategy) or discharge of condition (detailed design). The submission requirements are provided in Table 1 and are read as minimum requirements. It is expected that later stages of planning submissions will provide greater detail (such as estimates of storage vs modelled network calculations).

KCC recommends the inclusion of a summary sheet which contains pertinent information to assist in ensuring sufficient detail is submitted and to simplify the review process. A Drainage Strategy Summary Form is included in Appendix C.

We recommend that applicants confirm the submission requirements through pre-application discussion with KCC, particularly to identify any needs for ground investigation.

Table 1- Submission Requirements for stages of planning

Information required	Outline	Full	Reserved Matters	Discharge of Condition	Verification condition [11]
Identification of discharge destination					
Development information including location plan, site layout, and drainage schematic					
Surface water drainage strategy report or statement					
Calculation assumptions and results including impermeable areas, infiltration rates, network calculations and models					
Existing and proposed drainage arrangements			12		
Existing and proposed discharge rates					
Ground investigation reports/survey and soakage testing results					
Maintenance programs and access arrangements					13
As built drawings or tender construction drawings				14	
Exceedance plan [15]					
Catchment plans					
Water quality index					
Watercourse condition and connectivity					
Proposed detailed drainage network plans and cross-sections including cover and invert levels, locations of flow controls (Critical Drainage Assets)					
Attenuation device details including cross-sections					
Landscape Plan					
Discharge agreements, consents and/or evidence of third-party agreement for discharge to their system					
Phasing plan					
Identification or designation of maintaining authority/ organisation					

[11] specific requirement for confirmation of drainage. Please see section 4.3.5

[12] as required, where not already demonstrated in the original application
require greater design detail than previous planning stage Greatest amount of detail required

[13] Specific for each critical drainage asset

[14] Drawings of proposed construction

[15] includes conveyance, volume and depths

4.3.2 Large scale development

Surface water management strategies for large developments (with multiple phases) will require the submission of an overall drainage strategy at outline planning stage that provides the overall site drainage strategy and a framework for the delivery of the drainage in each phase of the site.

The Surface Water Management Strategy should set out the following for the whole site, and each phase:

- discharge destination(s);
- discharge rate and volume;
- catchment areas;
- estimated impermeable areas per phase and per catchment; and,
- phasing plan with timing of construction.

This Surface Water Management Strategy should act as an overall **drainage masterplan** for all phases of the development.

A Surface Water Management Strategy will be tied to a planning condition at the outline stage. Pre-application discussions are encouraged in the case of phased development to agree the level and detail of any strategic Surface Water Management Strategy and subsequent Detailed Drainage Strategies that will be required for each phase.

Depending upon the level of detail submitted at outline planning, it may be necessary to submit additional drainage information to accompany reserve matters associated with the layout to demonstrate that the Surface Water Management Strategy can be accommodated within the proposed layout.

Further details regarding the surface water management proposals for each phase of development should then be provided within a Detailed Drainage Strategy. Each phase must remain consistent with the overall site strategy and drainage masterplan.

Supporting information must be submitted to demonstrate that any variations can be accommodated within the site without exacerbating flood risk. The overall site Surface Water Management Strategy may be reviewed as different phases are delivered.

Large sites in close proximity or in one catchment are encouraged to cooperate or consult concurrently as there may be opportunities for combined solutions with mutual and greater benefit.

Any strategic drainage features that are required for the wider site's drainage strategy to function properly must be identified and delivered prior to the connection of the drainage from any phase or sub-phase. If a single site within a wider development (e.g. school or commercial site) is reliant upon the strategic drainage system, this must be clearly indicated within the phasing plan.

4.3.3 Consultation for minor and low risk development

Minor development will not normally be reviewed by KCC, unless specifically requested by the LPA due to local drainage concerns, existing or mapped surface water flood risk, or other matters identified by the LPA in relation to delivery of sustainable drainage.

In some instances, due to the size of the development or proposal, construction for drainage provision is not needed or substantial and therefore considered low risk. Low risk development for the purposes of consultation may be regarded, but not limited to:

- change of use[16];
- limited external building envelope alterations;
- or which results in less than 100 m^2 of additional impermeable area and which is not located in an area of existing flood risk or drainage problems.

4.3.4 Easements and way leaves

If any surface water flows off site and is required to cross third party land, then information must be submitted which demonstrates that the applicant has the ability to deliver the outfall from the site. This may require confirmation of agreement from a third-party landowner or confirmation of an agreed easement way leave.

4.3.5 Maintenance and verification

The design of any drainage system must take into consideration the construction, operation and maintenance requirements of both surface and subsurface components, allowing for any personnel, vehicle or machinery access required to undertake this work.

The continued operation of any drainage system is dependent upon ongoing maintenance, which may be undertaken by an adopting authority or management agent. Any drainage strategy must include details of the intended adopting authority or agent and specific details of appropriate and sufficient maintenance, and then be confirmed in the verification report.

Developers will be required to demonstrate that the drainage was constructed according to the approved plans through post-construction verification reports. These reports will also include maintenance and requirements specific to the drainage system constructed. Detailed drainage layouts will be required which also identify "critical drainage assets[17]".

---

[16] change of use where vulnerability is not increased

[17] KCC's definition of critical drainage assets would be those items of interest in relation to Section 21 (1A) of the Flood and Water Management Act (2010), namely any assets that are "likely to have a significant effect on a flood risk in its area" and could include items such as inlets, outlets, controls, attenuation structures etc. Further clarification can be provided by contacting KCC's Flood and Water Management team.

4.4 Adoptable highways and drainage

Most major development would normally include some aspect of highway construction or improvement, which may be adopted or require approval by KCC as the Highway Authority. The provision of drainage to adopted highways is normally subject to Section 38 or 278 Agreement, with approval and inspection by KCC as the Highway Authority.

Highway matters may be reviewed within the consultation by KCC as LLFA. KCC will endeavour to seek internal consultation on such matters; however, the detail provided within a planning submission may not be sufficient. The response from KCC as LLFA does not commit KCC as Highways Authority to any particular highways arrangement. The nature and extent of adoption should be confirmed with the Highways team at an appropriate time within the planning and design process.

Any review provided by KCC as LLFA within the planning process does not constitute a technical approval; however the LLFA's approval may be required prior to any further adoption by KCC as the Highways Authority.

5 Policies for Sustainable Drainage

5.1 Introduction

A range of sustainable drainage techniques may be utilised across a site to manage the surface water runoff from the planned development; the use of more than one technique will often be appropriate to achieve the objectives of sustainable development on any given site (notwithstanding situations which may still arise where a conventional solution may be the most appropriate).

Given the range of design options to provide a drainage solution, KCC has defined:

- **Drainage Policies (SuDS Policy 1 through 6) that set out the requirements for a drainage strategy to be compliant with the NPPF and guidance within the Non-Statutory Technical Standards for Sustainable Drainage.**
- **Environment Policies (SuDS Policy 7 through 9) that set out expectations to be considered within a drainage strategy in response to environmental legislation and guidance that KCC and the Local Planning Authorities have a duty to comply with.**

These policies, summarised in Table 2, reflect the requirements of the Local Flood Risk Management Strategy, Surface Water Management Plans and Local Planning Authority Local Plans. Sufficient information must be submitted to demonstrate that the drainage proposals comply with these policies.

Table 2: Kent County Council SuDS Policies

Policy	Summary
SuDS Policy 1	Follow the drainage hierarchy
SuDS Policy 2	Deliver effective drainage design
SuDS Policy 3	Maintain Existing Drainage Flow Paths & Watercourses
SuDS Policy 4	Seek to Reduce and Avoid Existing Flood Risk
SuDS Policy 5	Drainage sustainability and resilience
SuDS Policy 6	Sustainable Maintenance
SuDS Policy 7	Safeguard Water Quality
SuDS Policy 8	Design for Amenity and Multi-Functionality
SuDS Policy 9	Enhance Biodiversity

5.2 Drainage policies

These policies are specified from the NPPF and the guidance within the Non-Statutory Technical Standards for Sustainable Drainage, as published by Defra.

5.2.1 SuDS Policy 1: Follow the drainage hierarchy

Surface runoff not collected for use must be discharged according to the following discharge hierarchy:

- **to ground,**
- **to a surface water body,**
- **a surface water sewer, highway drain, or another drainage system, or**
- **to a combined sewer where there are absolutely no other options, and only where agreed in advance with the relevant sewage undertaker.**

The selection of a discharge point should be clearly demonstrated and evidenced.

When development occurs, the urbanisation process within a catchment affects the natural hydrology; if the destination of the water is altered this may result in:

- a reduced supply of rainfall to groundwater;
- an accelerated passage of flow to the receiving watercourses; and
- water directed away from existing receiving catchments.

In order to maintain the natural balance of the water cycle, the above discharge hierarchy must be adhered to. Where development results in changes in runoff destinations, the design must account for how the surface flows are managed and demonstrate it does not exacerbate off-site flood risk.

Any development application must follow the hierarchy and be accompanied by evidence as to why infiltration is not utilised. Technical information on the uses of infiltration is provided in Kent Design Making It Happen, including testing methodology and design criteria. Infiltration testing must assess infiltration rates appropriate to underlying ground conditions and may require consideration of both shallow and deep infiltration.

If infiltration is not feasible further information is required from appropriate authorities indicating the acceptability of a discharge location, discharge rate and consent to connect. This agreement may be with the relevant owner or responsible body including IDBs, highway authorities, sewerage undertakers, riparian owners, port authority, Environment Agency, Canals and River Trust and others.

Any connection or discharge must be compliant with regulations or guidance governing the operation of the existing drainage system (e.g. IDB by-laws or standard specifications for public sewers). Correspondence with the relevant owner or responsible body should be submitted to demonstrate agreement in principle to the discharge and connection point as early in the development planning process as possible.

If we are aware of a capacity issue or a sewer flooding issue that a sewer connection is likely to exacerbate, we will inform the Local Planning Authority and the sewerage undertaker. We may oppose any such proposal until it can be adequately demonstrated that the receiving authority has confirmed the acceptability of the intended rate of discharge.

Discharge to Ground

The drainage strategy may be constrained if the drainage discharges to the ground via infiltration in a source protection zone (specifically SPZ 1), area of low permeability or area with high groundwater. Consultation with the Environment Agency early in the planning process is recommended to identify any constraints or specific requirements in these areas, specifically in relation to groundwater contamination. We recommend reference to the EA's latest policy guidance on groundwater protection[18].

Discharge to Sewer

An existing connection to a sewer does not automatically set a precedent and it must be demonstrated why infiltration and/or a connection to a watercourse cannot be utilised. There is a presumption against any discharge of surface water to a foul sewer.

Combined sewer systems, which carry both foul and surface water, have limited capacity and are more likely to lead to foul flooding. In our commitment to ensuring development is sustainable, we will therefore seek to reduce surface water discharges to combined sewer systems.

We will encourage developers to look for available surface water systems within a radius of the proposed development before discharges to a combined sewer is agreed acceptable. For small developments surface water sewer connections should be assessed within 90m of the development site boundary. For larger development (over 100 units), a suitable distance for connection to a surface water sewer will be assessed at the time of planning, dependent upon the size and location of the development.

Where a surface water connection to an existing combined sewer is unavoidable, it must be undertaken in such a manner and at such a location to facilitate future separation of the surface water from that combined system.

---

[18] The Environment Agency's approach to groundwater protection, February 2018 or latest version as published. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Envirnment-Agency-approach-to-groundwater-protection.pdf

Discharge to Highway Drains

KCC may consider surface water discharges into highway drainage sewers in the following circumstances:

a) the developer/property owner is prepared to upgrade the system where required to accommodate any increased flows; and,
b) there is a proven existing connection to the highway drainage systems.

Highway drainage connections should be raised in pre-application discussion with KCC to ensure there will be appropriate arrangements in place for highways and drainage adoption, where appropriate. Highways advice for planning applications is provided on the County's website. Please refer to Kent Design Guide - *'Making it Happen'.*

Other Consents

Other consents by regulation may be required in relation to the discharge location (e.g. Flood Risk Activity Permit and Ordinary Watercourse consent). KCC may recommend consultation with other authorities in these instances.

5.2.2 SuDS 2: Deliver effective drainage design

Any proposed new drainage scheme must manage all sources of surface water and should be designed to match greenfield discharge rates, and volumes as far as possible.

Development in previously developed land should also seek to reduce discharge rates and volumes off-site and utilise existing connections where feasible.

Drainage schemes should provide for exceedance flows and surface flows from offsite, ensure emergency ingress and egress and protect any existing drainage connectivity, so that flood risk is not increased on-site or off site.

Design Criteria

The drainage system must be designed to be consistent with pre-development flow rates and designed to operate without any flooding occurring during any rainfall event up to (and including) the critical 1 in 30 year storm (3.33% AEP). The system must also be able to accommodate the rainfall generated by events of varying durations and intensities up to (and including) the critical, climate change adjusted 1 in 100 year storm (1% AEP) without any on-site property flooding and without exacerbating the off-site flood-risk. The choice of where these volumes are accommodated may be within the drainage system itself or within other areas designated within the site for conveyance and storage.

Flooding of the highway **may** be permitted in exceptional circumstances for rainfall events between 1 in 30 year and 1 in 100 year events provided that:

- depths do not exceed the kerb height;
- no excessive or prolonged ponding (beyond 10 minutes) so that the highway primarily operates as a conveyance route to another attenuation feature;
- flood extents are within the site boundary.

Rainfall Simulation

KCC will generally require the use of the more detailed and up-to date FEH13 dataset within detailed drainage design submissions. Where FSR data is used to determine the extreme rainfall intensity values for a site, we would expect the FSR/FEH ratios depicted in Appendix 1 of the 'Rainfall runoff management for developments' report[19] (Environment Agency, 2013) to be used to adjust the calculated attenuation requirements.

If FEH13 is unavailable (and unless otherwise calculated), we will accept a rainfall depth M5-60 of 26.25 mm to be utilised in appropriate modelling software to account for this variation.

[19] http://evidence.environmentagency.gov.uk/FCERM/Libraries/FCERM_Project_Documents/Rainfall_Runoff_Management_for_Developments_-_Revision_E.sflb.ashx

Runoff Rates

Greenfield runoff rates must be supplied. Preferred methods are IoH124, FEH, ReFH2 or others as agreed with KCC. The rates must reflect soil conditions specific to the site and applied to an appropriate drainage area consistently through the drainage strategy.

- Local District or Parish Greenfield Runoff Rates

Local planning policy may identify preferred discharge rates to be utilised in place of greenfield rates based upon a strategic flood risk assessment. In these areas, the preferred discharge rates should be utilised in the design.

KCC may also set strategic discharge rates to contribute to flood risk management within a district or parish council area; or to provide a more efficient approach to surface water management within a local area. If a strategic assessment of greenfield runoff rates has been undertaken by KCC, these rates must be utilised in design.

- Minimum discharge rates

Small sites are associated with low greenfield runoff rates. Given advances in technology and design of flow controls, it is now possible to achieve controlled flow rates of 2 l/s. This should be considered the minimum rate to be set for small sites, unless agreed with KCC.

- Capacity constraints

If the proposed development contributes to an area or network with known local flood risk issues or capacity constraints, then discharge rates and volume control specific to the local conditions will be specified. Developers may be required to provide flood risk modelling/ assessment to identify potential constraints.

- Previously developed land

Redevelopment on previously developed land or "brownfield land" has the potential to rectify or reduce flood risk. For developments which were previously developed, the peak runoff rate from the development must be as close to the greenfield runoff rate from the development as reasonably practicable for the same rainfall event, but must not exceed the rate of discharge from the development prior to redevelopment for that event. As a minimum we would expect to see evidence that a 50% reduction in the peak runoff rate from the existing site has been sought.

An assessment of the peak flow rate of an existing drainage system must consider: (a) the connectivity and condition of the drainage system; (b) the existing total impermeable area contributing to the drainage system; and (c) the pipe full capacity of the final 5m of the outfall pipe. Within all accompanying calculations, the post-redevelopment discharge rate must take account of the predicted effects of climate change.

Runoff characteristics for a previously developed site can be estimated by other methods as described within the CIRIA SuDS Manual (Chapter 24.5). It should be noted that if a simulation model for any existing network is utilised, the operation of the network must be confirmed by a network survey to establish the network arrangements, contributing areas and network condition.

Runoff Volumes

Runoff volumes from the developed site will usually increase in comparison to the site in its natural condition; this may increase flood risk in natural receiving systems. Controlling the volume of runoff from the site is therefore vital to prevent flood risk in natural systems. Within Kent, the need and type of volume control will vary according to the soil type present, which can be broadly broken down into the following categories:

- Highly permeable soils – in areas underlain by chalk, we will expect that use of infiltration will be maximised. With no off-site discharge, additional volume control will not be required
- Intermediate permeability soils - in these areas infiltration should still be maximised; offsite discharge should be limited to QBAR, (the mean annual flood flow rate, equivalent to an approximate return interval of 2.3 years). Where sites are small and flows are calculated to be less than 2 l/s, the minimum flow rate will apply of 2 l/s.
- Low permeability soils - areas underlain by largely impermeable soils (e.g. Weald clay and London clay) will require "staged" discharge.

This requires that rates mimic existing greenfield runoff rates of the 1:1 year, 1:30 year and 1:100 year storm events as long as long term storage is utilised for flow volumes in excess of the greenfield volume for the 1:100 year 6 hour event.

The long term storage volume must discharge at a rate no greater than 2 l/s/ha and the total flow rate must not exceed the 1:100 year greenfield flow rate.

If long term storage is not designed for, QBAR should be applied to all events from the 1:30 year rainfall event.

Exceedance

Exceedance flows that cannot be contained within the drainage system shall be managed in flood conveyance routes. The primary consideration shall be risks to people and property on and off site.

Exceedance should be considered in two parts; very high intensity storms to ensure bypass flows from overloaded pipework (including potentially blocked gullies due to debris), and overfilling of storage systems. Consideration of exceedance routes will ensure that any residual risk arising from either or these are safely managed.

Emergency access arrangements

Access should be maintained into and through the site for emergency vehicles during all storms up to (and including) the critical, climate-change adjusted 1 in 100 year event. The drainage application must give consideration to flood risk vulnerability classifications (as defined through Planning Practice Guidance to the National Planning Policy Framework), as specific measures or protections may be assessed and need to be agreed with the appropriate authority.

Unrestricted discharge rates

If the proposed system discharges to a watercourse or main river, consideration must also be given to any requirements due to high water levels in the receiving watercourse due either to tide (i.e. tide-locking) or flood flows. Attenuation volumes required onsite to manage flows must take into account the effects of high receiving water levels. This also applies to connection made to sewers.

If the proposed site is immediately adjacent to a watercourse or main river, there may be instances where direct discharge to the waterway is promoted without attenuation. This is only likely to be a recommendation on or immediately upstream from tidal areas. Direct discharge without attenuation or limited attenuation based on high (non-standard) discharge rates to a main river must be agreed in consultation with KCC and the Environment Agency.

Phased Delivery

If a proposed development is to be delivered in phases, a commitment should be made for a surface water management strategy to be delivered with the first phase of development, designed to be capable of accommodating the runoff from each of the subsequent phases. If this is not possible, the runoff from each separate phase must be controlled independently.

Whichever approach is taken, the control of surface water runoff during construction should be considered. Temporary works may be required to accommodate phased construction. Any temporary drainage measure must be identified and clearly shown on a drainage layout drawing.

5.2.3 SuDS Policy 3: Maintain Existing Drainage Flow Paths & Watercourses

Drainage schemes should be designed to follow existing drainage flow paths and catchments and retain where possible existing watercourses and features.

By mimicking the natural drainage flow paths and working within the landscape, more effective and cost-efficient design can be developed. Working with existing natural gradients also avoids any reliance on pumped drainage, with its associated energy use and failure risk. The natural environment including woods, trees and hedgerows can play a part in water management.

KCC encourages maintenance of the existing flow paths and drainage connectivity. Where this is the case the following conditions apply:

a) If the proposed development is reliant on an existing discharge point, then it is recommended that the condition and conveyance capacity is confirmed through CCTV or other survey with the discharge capacity confirmed.

b) Outfalls to ordinary watercourses should not occur to "blind-ended" ditches and should be part of a wider and contiguous drainage network.

Some sites may lie in or near more than one hydrological catchment. Surface water flows should be continued through the pre-development catchments and not diverted to adjacent catchments, in order to preserve the hydrology of catchments and prevent an increase in flood risk.

Ordinary Watercourses

An 'ordinary watercourse' is defined as any channel capable of conveying water that is not part of a 'main river'; Small rivers, streams, ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991) can all be classified as 'ordinary watercourses'.

When considering the development/redevelopment of any site, existing ordinary watercourses should be identified and accommodated within any drainage strategy and site masterplan. They should be preferably retained as an open feature within a designated corridor, and ideally retained within public open space. Any outfall to an ordinary watercourse should be designed to ensure there is adequate erosion protection for the receiving channel and its banks.

It is not sufficient to undertake earthworks to the top of the bank of a boundary ditch. Any site improvements should include the channel itself. The landowner has riparian responsibilities for these ditches and new development provides an opportunity to address any existing ditch issues such as excessive vegetation, channel clogging, culvert improvements or bank stability.

It is recommended that any discharge to an ordinary watercourse or any modification to an ordinary watercourse be identified and agreed in principle with KCC (or other consenting

authority if required) prior to the submission of any planning application. The ability of a watercourse to convey water (and to function as an effective exceedance flow route, where appropriate) will always need to be maintained.

Flood risk

For ordinary watercourses, developers may need to consider the potential flood risk arising from them, particularly where there are structures which might influence water levels. Where a risk from flooding has been identified, appropriate flood risk mitigation should be identified and agreed with the Local Planning Authority/ KCC; development should be avoided in any area likely to be affected by exceedance of the channel's capacity, reflecting requirements of SuDS Policy 4.

Culverts

Culverting of open watercourses will not normally be permitted (except where demonstrably essential to allow highways and/or other infrastructure to cross). In such cases culverts should be designed in accordance with CIRIA C689: Culvert Design and Operation Guide, (2010) and KCC's Land Drainage Policy. Culverts will not be approved below/ beneath any proposed structure.

If a culverted watercourse crosses a previously developed site, it should be reverted back to open channel, wherever practicable. In any such case, the natural conditions deemed to have existed prior to the culverting taking place should be re-instated.

Measures should be in place to ensure that any future owner of a property through which a watercourse passes is aware of their maintenance responsibilities as a riparian owner.

Under the terms of the Land Drainage Act 1991, any works within an ordinary watercourse will require consent under Section 23 of the Act. This will be either from KCC or from an IDB (in the areas where they operate). Consents are unable to be amended once granted so any changes to design will need to apply for Land Drainage consenting again. Consents cannot be granted retrospectively if works are undertaken prior to approval.

If land drainage consent is required in relation to the proposed development, we recommend that the submission of any application for consent is delayed until planning permission is granted, (excepting instances when consents are required to construct or upgrade site access) as the proposed site layout may be subject to further change. Please refer to KCC web pages for guidance on ordinary watercourse consents[20].

Overland flow paths

Account should be taken for any overland flow routes which cross the site from adjacent areas. Flow routes may be indicated by reference to the EA's surface water flow mapping however the magnitude of the contribution from upstream catchments should be assessed to determine flows and the extents of flooding. It is usually preferred that these flow routes would be accommodated within the development layout; however, flood assessment or more detailed modelling may be undertaken if these routes are to be modified or channelised. It is not acceptable to culvert overland flow routes.

5.2.4 SuDS Policy 4: Seek to Reduce and Avoid Existing Flood Risk

New development should be designed to take full account of any existing flood risk, irrespective of the source of flooding.

Where a site or its immediate surroundings have been identified to be at flood risk, all opportunities to reduce the identified risk should be investigated at the masterplanning stage of design and subsequently incorporated at the detailed design stage.

Remedial works and surface water infrastructure improvements may be identified in the immediate vicinity of the development to facilitate surface water discharge from the proposed development site.

Paragraph 165 of the National Planning Policy Framework outlines how flood risk management bodies should seek to manage flood risk through using opportunities offered by new development to reduce the causes and impacts of flooding, taking the predicted effects of climate change into account.

As LLFA, KCC will endeavour to ensure that this principle is applied across the County. Where a developer's Drainage Strategy has identified that there are existing flood risks affecting a site or its surroundings, there would be an expectation that the developer manages the identified risk appropriately to ensure that there are no on or off site impacts as a result of any development. Similarly, where there are opportunities to reduce the off-site flood risk through carefully considered on-site surface water management, we will encourage developers to explore these fully.

Avoiding areas of flood risk

All development should be preferentially located in the areas of lowest flood risk, irrespective of the source of flooding. At the earliest stages of masterplanning, an appropriate flood risk or drainage impact assessment should be undertaken to ensure that any vulnerable forms of development are located outside Flood Zones 2 or 3 and/or those areas identified as being at medium to high risk of surface water flooding. The Environment Agency's Flood Map for Planning and Long-Term Flood Risk pages should be referred to for this information.

Residential buildings should in the first instance not be located within any area indicated to be at high risk[21] from surface water flooding, according to the Long Term Flood Risk[22] maps or any local flood maps.

If development is unavoidable within a surface water flood risk or flow route, then the land use should be water compatible; designed and constructed to be flood resilient; having consideration of the estimated flow depths and be designed accordingly.

---

[20] www.kent.gov.uk/waste-planning-and-land/flooding-and-drainage/owning-and-maintaining-a-watercourse

[21] High risk means that each year an area has a chance of flooding of greater than 3.3% (i.e equates to 1 in 30-year risk of flooding), with flood depths over 900mm and velocities over 0.25 m/s.

[22] https://flood-warning-information.service.gov.uk/long-term-flood-risk

Remedial works and infrastructure improvements

Local flood risk "hot spots" may be known to KCC or the local council in the vicinity of the proposed development. If the receiving system is in a poor condition and unable to convey flow effectively, remedial works may be required prior to connection or discharge to the system.

A condition survey of the outfall location and of the receiving system may be required to confirm connectivity and capacity along with any potential works required to ensure discharge can occur without impedance.

Dependent upon ownership and responsibilities, these works may be recognised as part of the development description for the proposed development as would occur for any infrastructure improvement to accommodate strategic growth, new connections and new local development.

5.2.5 SuDS Policy 5: Drainage Sustainability and Resilience

The design of the drainage system must account for the likely impacts of climate change and changes in impermeable area over the design life of the development. Appropriate allowances should be applied in each case.

A sustainable drainage approach which considers control of surface runoff at the surface and at source is preferred and should be considered prior to other design solutions.

Drainage infrastructure normally has a defined design life. This varies depending upon the nature of the system's components. The drainage must be designed to function properly to protect the development and downstream from flooding over this timeframe. This includes accommodating predictable changes, including climate change and urbanisation.

Climate Change

In 2016, the Environment Agency published new guidance on how to use climate change allowances in flood risk assessments. The guidance can be found at: www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances

KCC require that the drainage design accommodates the 1 in 100 year storm with a 20% allowance for climate change, with an additional analysis undertaken to understand the flooding implication for a greater climate change allowance of 40%.

This analysis must determine if the impacts of the 40% allowance are significant and lead to any unacceptable flood risks (it is not normally expected that the site would not flood in this scenario, only that if this storm were to occur the impacts would be minimal i.e no flooding of property or sensitive infrastructure and no flooding leaves the site). The design may need to be modified to avoid any unacceptable risks, but may also need additional mitigation allowances, for example a higher freeboard on attenuation features or provision of exceedance routes. This will tie into designing for exceedance principles.

Sustainability

Design of drainage systems utilising a sustainable drainage design approach and reducing reliance on below ground systems in pipes and tanks, provides greater visibility for maintenance as well as many other benefits. Sustainable measures which control flow rates near to the source and which maximise natural losses through infiltration and evaporation are preferred. Operation of surface systems is also more easily observed.

Urban Creep

To take account of possible future conversion of permeable surfaces to impermeable over time (e.g. surfacing of front gardens to provide additional parking spaces, extensions to existing buildings, creation of large patio areas). Consideration of urban creep should be assessed for residential developments.

An allowance for the increase of impermeable area from urban creep must be included in the design of the drainage system. The allowances set out in Table 3 must be applied to the impermeable area within the property curtilage according to the proposed dwelling density.

Table 3: impermeable area allowances for urban creep

Residential development density(Dwellings per hectare) (% of impermeable area)	Change allowance
≤ 25	10
30	8
35	6
45	4
≥ 50	2
Flats & Apartments	0

5.2.6 SuDS Policy 6: Sustainable Maintenance

Any proposed drainage schemes must be designed to be maintainable to ensure that that the drainage system continues to operate as designed and must be accompanied with a defined maintenance plan.

The drainage system must be designed to take account of the construction, operation and maintenance requirements of both surface and subsurface components, allowing for any personnel, vehicle or machinery access required to undertake this work. Without maintenance, the function of drainage systems may alter. Increased leaf litter, sediments and colonisation of vegetation may clog drainage measures or impact the characteristics of operational controls.

Design to be maintainable

The drainage strategy must demonstrate that adequate access is available and practicable for personnel and equipment either through an appropriate layout or legal agreement to provide agreed access arrangements in perpetuity. Consideration should also be given to the Construction Design and Management regulations for health and safety purposes.

Wherever possible, it is preferable that drainage schemes should be designed at the surface to allow easy inspection and maintenance. Drainage maintenance can usually be incorporated as part of a typical landscape maintenance specification.

KCC recommends that shared drainage measures or drainage measures serving the wider development are located within common land or public open space to facilitate easy access and maintenance. Drainage measures which serve more than one property should not be located within back gardens or other private areas.

If the proposed development incorporates existing field ditches or ordinary watercourses, we would normally require a minimum setback of 5 m to 8 m (depending upon the location, and whether the ditch/watercourse falls within an IDB regulated area). This will allow the safe access and operation of any tracked machinery that may be required to undertake any maintenance works to the banks or channels, and provides a reasonable buffer for any flora and fauna within the watercourse.

We would generally recommend that new development is designed to facilitate the maintenance of existing watercourses, with roads or walkways being provided alongside at least one bank for access. Closed fence-lines to the rear of properties bordering a watercourse should be avoided owing to the maintenance difficulties and the potential for the inappropriate depositing of material beyond property boundaries.

With surface water drainage systems, a careful balance must be struck over the creation of habitats. The encouragement of certain protected species or creation of protected habitats may conflict with the regular maintenance works essential to ensuring long term functionality of the drainage measures. An awareness of any biodiversity objectives or site wide strategic ecological management plan should be considered as part of a maintenance plan for the drainage measures, specifically timing of vegetation cuts and silt removal to ensure no conflict with nesting birds or specific life stages of biota.

Where, in particular circumstances, underground techniques are used, more extensive inspection processes will be necessary, for example where longer pipe runs are used, CCTV surveys may be required. All inlet, outlet and control structures must be indicated and known to the appropriate adopting authority to be protected from blockage and located near the surface, to allow for easy management during routine maintenance visits.

Maintenance Plan

An operation and/or maintenance plan should be provided which indicates a schedule and time of activities, as well as critical controls or components of the drainage scheme. This plan should include an indication of the roles and responsibilities for each authority or organisation which may have a responsibility for maintenance activities. Any inter-connectivity with or reliance upon other drainage systems should be indicated.

KCC may work with LPAs to ensure that the drainage schemes associated with large, strategic, potentially problematic or sensitive sites have been established and are able to function in accordance with the approved plans and specifications.

Information on maintenance requirements will be required in early stages of planning submissions to demonstrate that adequate access is provided.

Verification report

KCC may also require the submission of a Verification Report after development completion (Appendix D). This report will demonstrate that the constructed drainage system operates as approved; will include the identification of "critical drainage assets"; and, will outline specific maintenance requirements and obligations for each drainage measure.

As LLFA, KCC has a duty to maintain a register of structures or features which are likely to have a significant effect on flood risk. Drainage schemes within new developments may include structures or features that will be required to be included within the register. Critical drainage assets which are not adopted by others will be recorded.

5.2.7 SuDS Policy 7: Safeguard Water Quality

When designing a surface water management scheme, full consideration must be given to the system's capacity to remove pollutants and to the cleanliness of the water being discharged from the site, irrespective of the receiving system.

Interception of small rainfall events should be incorporated into the design of the drainage system.

Paragraph 170 (e) of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to (or being put at unacceptable risk from) unacceptable levels of water pollution or land instability. Development should whenever possible help improve local environmental conditions.

Additionally, the Water Framework Directive has been established to improve and integrate the way water bodies are managed throughout Europe. It provides a legal framework to protect and restore clean water throughout Europe to ensure its long-term sustainable use. In particular it will help deal with diffuse pollution which remains a big issue following improvements to most point source discharges.

The design of any drainage proposal should therefore ensure that surface water discharges do not adversely impact the water quality of receiving water bodies, both during construction and when operational. Sustainable drainage design principles have the potential to reduce the risk of pollution, particularly through managing the surface water runoff close to the source and on the surface. Below grade pipes and tanks which are efficient for drainage purposes may not provide appropriate water quality treatment.

The CIRIA SuDS Manual describes a methodology for determining the hazard posed by land use activities (refer to Chapter 26 of the CIRIA SuDs Manual). A simple index approach enables an assessment of the pollution hazard and value of mitigation provided by the sustainable drainage measure. This assessment will be required for all applications.

Runoff from small rainfall events can pose a particular problem for water quality. The 'first flush' of runoff contains the initial high concentration load of pollutants that has built-up on surfaces during the preceding dry period. It is possible to get a high initial pollution concentration for relatively small rainfall events.

Rainfall events that are less than or equal to 5mm in depth also comprise more than half of the rainfall events that took place. The volume of runoff from these small events therefore can cumulatively contribute significantly to total pollutant loadings from the site over a specified period of time. Interception of an initial rainfall depth of 5mm for all rainfall events would mimic greenfield response characteristics in that runoff from small rainfall events do not generally produce any run-off.

KCC would expect that developers demonstrate that the first 5mm of any rainfall event can be accommodated and disposed of on-site, rather than being discharged to any receiving watercourse or surface water sewer. This can easily be achieved through the inclusion of sustainable drainage measures such as infiltration systems, rain gardens, bioretention systems, swales, and permeable pavement.

Where it proves exceptionally difficult to achieve this principle, it must be demonstrated that any water leaving the site has been appropriately treated to remove any potential pollutants.

When discharging to the ground, ground conditions and protection of any source protection zones should be confirmed.

Discharge to ground shall only occur within clean, competent, natural and uncontaminated ground and information should be provided to demonstrate that a sufficient unsaturated zone has been provided above the highest occurring groundwater level. Advice may need to be sought from the EA Groundwater team in relation to these matters, particularly in SPZ 1 and may require specific mitigation. Infiltration into Made Ground will not be accepted.

Construction Management Plan

The management and control of erosion and sediment should be considered throughout design and construction, operation and maintenance to ensure that no impact to offsite watercourses occurs.

Sedimentation can cause the loss of aquatic habitat, decreased fishery resources and can lead to increased flooding due to reduction in hydraulic capacity of the watercourse.

A Construction Management Plan will be required to demonstrate that erosion and sediment controls are adequately planned to protect water quality in receiving water environments. Any sites within a sensitive receiving catchment may require additional information. Situations in which this is a consideration will be confirmed through coordination with KCC's Biodiversity team and the Environment Agency.

5.2.8 SuDS Policy 8: Design for Amenity and Multi-Functionality

Drainage design must consider opportunities for inclusion of amenity and multi-functionality objectives and thus provide multi-functional use of open space with appropriate design for drainage measures within the public realm.

Local environmental objectives may identify other benefits which can be agreed to be delivered through appropriate design of the drainage system.

Amenity and Open Space

Where land performs a range of functions it affords a far greater range of social, environmental and economic benefits than might otherwise be delivered (Landscape Institute Position Statement, Green Infrastructure). Open spaces are often multifunctional, fulfilling several different valuable roles; for example, in the main they may be for recreational use, but they may also provide valuable wildlife habitat, an attractive landscape, paths for walking and cycling and space for community events.

Well-designed, open, sustainable drainage measures may also provide this degree of opportunity, optimising all of these functions in a way which fits with the surrounding landscape. For example, park areas which can be used as temporary flood storage during heavy rainfall events, and wetlands being used to deliver amenity value and habitat as well as water treatment. The aim should be to create networks of high quality open space which adapt for attenuation of surface water, sports and play and enhancement of biodiversity.

The integration of sustainable drainage measures into open spaces can introduce open water and variable ground surfaces into the public realm with associated risks of: drowning; slips, trips and falls; waterborne disease; and bird strike if near airports. The majority of potential risks can be assessed and removed through good site design. Reference should be made to best practice for appropriate design is provided in CIRIA's 'SuDS Manual'.

Multi-functional Design Benefits

Multi-functional design may also deliver other benefits as summarised in Table 4 (BS 8582 Code of Practice for Surface Water Management for Development Sites). New evaluation tools (B£ST Benefits Estimation Tool, CIRIA) may enable a full accounting of benefits to demonstrate economies and efficiencies to including specific design elements within the drainage provision. Simple elements such as inclusion of trees, or rain gardens within kerb build-outs may deliver other priorities being sought by the local authority.

Table 4: Multi functional surface water management design (Source: BS 8582:2013)

Infrastructure objective	Multi-functional surface water management system design and associated environmental value
1. Recreational opportunities	• Subsurface attenuation storage systems can be sited below permeable surfaces used for recreation • Infrequently flooded detention zones can also serve as recreational/amenity areas • Vegetated conveyance and/or storage systems can be designed to promote education, play and amenity value • Intensive green roofs can provide amenity landscape in dense urban settings • Surface water management components can be integrated with sustainable transport corridors (e.g. cycle routes) to maximize benefits
2. Water resources conservation	• Surface water run-off from roofs and uncontaminated paved surfaces, can be captured and stored for use • Rainwater harvesting systems can be designed to deliver surface water management benefits in addition to water supply (see BS 8515)
3. Habitats/ biodiversity enhancement	• Vegetated surface water management components, which store or convey water either temporarily or permanently, can often deliver locally important habitat • Such areas can contribute to urban "corridors" and "networks" of green (vegetated) and blue (water) spaces that support the movement of species
4. Traffic management	• Appropriately designed roads can provide, during times of extreme rainfall, short-term effective management of flood waters, either for conveyance or storage • Local road surfaces and pavements can often be designed to be pervious and allow run-off to infiltrate into the sub-base • Bioretention/biofilter zones can be integrated within pavement design to provide both traffic calming and stormwater management units • Vegetated swales running alongside roads can be designed to treat and control road run-off • Tree pits can be included to intercept run-off (with additional subsurface storage included within or adjacent to the pit)

5. Car parking	• Where the car parking surface is designed to be pervious, surface water can be stored and treated within the sub-base, prior to either controlled discharge, infiltration to the ground, or use. • Car parks can store additional volumes of floodwater above the surface during extreme events. • Vegetated strips, swales, bioretention systems and basins can be designed adjacent to the car park to treat and control run-off
6. Public education/ awareness	• Local community engagement strategies can deliver: • an understanding of the functionality and environmental importance of the surface water management system in mitigating human impacts • a commitment towards contributing to the management of the drainage components • an understanding of the health and safety risk management strategy for the site in relation to surface water • ideas as to how the system could be used to promote children's education strategies and increased local amenity benefits
7. Air temperature / urban heat island mitigation	• Urban cooling can be promoted via the return of moisture to the air through evaporation and evapotranspiration from vegetated surface water management features • Direct cooling can be provided by trees integrated within the surface water management system providing shade • Green roofs and vegetative surfaces reflect more sunlight and absorb less heat
8. Reduced energy use	• Green roofs provide good building insulation
9. Air quality improvement	• Trees, larger shrubs and vegetated surfaces used as part of the surface water management strategy can filter out airborne pollutants
10. Landscape character	• Well designed and integrated SuDS features can enhance aesthetic appeal and local landscape and townscape character and distinctiveness
11. Health benefits	• Green and blue space within developments promotes health benefits linked to increased outdoor recreation and a feeling of well being

5.2.9 SuDS Policy 9: Enhance Biodiversity

Drainage design must consider opportunities for biodiversity enhancement, through provision of appropriately designed surface systems, consideration of connectivity to adjacent water bodies or natural habitats, and appropriate planting specification.

Biodiversity is defined as the variety of life on Earth; designing to protect and enhance biodiversity is therefore essential. As a direct result of human activity, the rate of species extinction over the last 200 years is far higher than in any period of the preceding 65 million years[23]. In the UK, freshwater ecosystems are at the most risk and populations of key species have declined significantly.

The NPPF requires that Local Planning Authorities set out a strategic approach to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (NPPF para 171). Maximising the ecological value of drainage systems is consistent with national and local policies which aim to conserve and enhance biodiversity. This is underpinned by a variety of legislation including the biodiversity 'duty' for public bodies which is enshrined in the Natural Environment and Rural Communities (NERC) Act 2006.

Working with the landscape to provide drainage may promote other opportunities with greater benefits for biodiversity but also provide greater attractiveness. The linear nature of many SuDS features can help create green corridors through developments; these are important for wildlife and ensure that the associated development is connected with its surrounding environment.

KCCs 'SuDS and Biodiversity' project (2014) has demonstrated that drainage schemes within residential areas contribute to the biodiversity of the local area and provide important habitats for animals and plants that would otherwise be absent. In some cases invertebrate species of significant nature conservation value have been found.

A number of key factors were identified to strongly influence the biodiversity value of the sustainable drainage features. These included:

- connectivity with other waterbodies and habitats,
- planting assemblage and cover,
- waterbody design,
- retained water,
- fish/wild fowl presence, and
- water quality.

When assessing drainage design, particularly surface systems, it is important to consider the drainage scheme in the context of the surrounding landscape character area. Effective integration will also require carefully researched and selected plants, which work to improve the local green infrastructure.

The design of any drainage scheme can provide an opportunity for increasing biodiversity value by including surface vegetated systems with some retained water and through ensuring appropriate edge treatments and gradients. Review of engineering design by an ecologist may identify simple improvements in pond design and planting specification that would maximise the biodiversity potential.

Glossary

Aquifer	A source of groundwater compromising water-bearing rock, sand or gravel capable of yielding significant quantities of water.
Adopting authority	General term utilized in this guidance and relates to the authority that will ultimately manage the proposed drainage system
Attenuation	Attenuation is the process of water retention on site and slowly releasing it in a controlled discharge to a surface water or combined drain or watercourse. The amount of discharge will vary depending whether it is a brown or greenfield site. For brownfield sites the developer must determine the likely run off and agree an acceptable discharge with the LLFA, environment agency or water authority.
Brownfield site	Any land or site that has been previously developed.
Catchment	The area contributing surface water flow to a point on a drainage or river system.
CIRIA	Construction Industry Research and Information Association. www.ciria.org
Climate change	Long-term variations in global temperature and weather patterns both natural and as a result of human activity (anthropogenic) such as greenhouse gas emissions
Culvert	A structure which fully contains a watercourse as it passes through an embankment or below ground.
Development	The undertaking of building, engineering, mining or other operations in, on, over or under land or the making of any material change in the use of any buildings or other land.
EA	Environment Agency. Government Agency responsible for flooding issues from main river, and strategic overview of flooding.
Flood event	A flooding incident usually in response to severe weather or a combination of flood generating characteristics.
Flood risk	The combination of the flood probability and the magnitude of the potential consequences of the flood event.
Flood Risk Assessment	An appraisal of the flood risks that may affect development or increase flood risk elsewhere
Flood Zones	Flood Zones provide a general indication of flood risk, mainly used for spatial planning.

[23] www.un.org/sustainabledevelopment/blog/2019/05/nature-decline-unprecedented-report/

Floodplain	An area of land that would naturally flood from a watercourse, an estuary or the sea.
Freeboard	A vertical distance that allows for a margin of safety to account for uncertainties.
Flood and Water Management Act	The Flood and Water Management Act clarifies the legislative framework for managing surface water flood risk in England.
Flow control device	A device used to manage the movement of surface water into and out of an attenuation facility.
Geocellular storage systems	Modular plastic systems with a high void ratio, typically placed below ground which allow for storage of storm water to infiltrate or discharge to another system.
Gravity drainage	Drainage which runs through pipework installed to a fall, and not therefore under pressure.
Greenfield	Undeveloped land.
Greenfield runoff rate	The rate of runoff which would occur from a site that was undeveloped and undisturbed.
Groundwater	Water that exists beneath the ground in underground aquifers and streams.
Groundwater flooding	Flooding caused by groundwater rising and escaping due to sustained periods of higher than average rainfall (years) or a reduction in abstraction for water supply.
Highway Authority	Body responsible for the management and maintenance of public roads
Impermeable	Will not allow water to pass through it.
Impermeable surface	An artificial non-porous surface that generates a surface water runoff after rainfall.
Infiltration	Infiltration or soakaway is the temporary storage of water to allow it to naturally soak away into the ground. Because water soaks into the ground gradually, reduces the risk of flooding downstream. Infiltration may be used where there is no surface water sewer or where existing systems are at full capacity. Infiltration helps to recharge natural ground water levels.

Internal Drainage Board (IDB)	An internal drainage board (IDB) is a public body that manages water levels in an area, known as an internal drainage district, where there is a special need for drainage. IDBs undertake works to reduce flood risk to people and property, and manage water levels for agricultural and environmental needs within their district. There are six IDBs in Kent:
	The River Stour Upper Medway Lower Medway Romney Marshes Area North Kent Marshes
Lead Local Flood Authority	Under the terms of the Flood and Water Management Act 2010, LLFAs are responsible for developing, maintaining and applying a strategy for local flood risk management in their areas and for maintaining a register of flood risk assets. They also have lead responsibility for managing the risk of flooding from surface water, groundwater and ordinary watercourses. Kent County Council are the LLFA within Kent.
Local Flood Risk Management Strategy	Strategy outlining the Lead Local Flood Authority's approach to local flood risk management as well as recording how this approach has been developed and agreed.
Main River	A watercourse designated on a statutory map of Main rivers, maintained by Department for Environment, Food and Rural Affairs (Defra).
Mitigation measure	A generic term used in this guide to refer to an element of development design which may be used to manage flood risk to the development, or to avoid an increase in flood risk elsewhere.
National Planning Policy Framework	Framework setting out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
Overland Flow	Flooding caused by surface water runoff when rainfall intensity exceeds the infiltration capacity of the ground, or when the soil is so saturated that it cannot accept any more water.
Permeability	A measure of the ease with which a fluid can flow through a porous medium. It depends on the physical properties of the medium.

Pitt Review	An independent review of the 2007 summer floods by Sir Michael Pitt, which provided recommendations to improve flood risk management in England.
Rainwater harvesting	Collection and Re-use or recycling of rainwater for the purpose of garden irrigation, car washing, toilet flushing etc.
Runoff	Water flow over the ground surface to the drainage system. This occurs if the ground is impermeable, is saturated or if rainfall is particularly intense.
Source Protection Zone	Defined areas showing the risk of contamination to selected groundwater sources used for public drinking water supply.
Strategic Flood Risk Assessment	A study to examine flood risk issues on a sub-regional scale, typically for a river catchment or local authority area during the preparation of a development plan.
Surface water flooding	Flooding caused by the combination of pluvial flooding, sewer flooding, flooding from open channels and culverted urban watercourses and overland flows from groundwater springs
Surface Water Management Plan	A study undertaken in consultation with key local partners to understand the causes and effects of surface water flooding and agree the most cost effective way of managing surface water flood risk for the long term.
SUDS	Sustainable (urban) drainage systems. A sequence of management practices and control structures that are designed to drain surface water in a more sustainable manner.
Watercourse	A term including all rivers, streams, ditches, drains, cuts, culverts, dykes, sluices and passages through which water flows.

Appendix A. National Planning Policy Framework (Extract)

155	Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
157	All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: a) applying the sequential test and then, if necessary, the exception test as set out below; b) safeguarding land from development that is required, or likely to be required, for current or future flood management; c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.
163	When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment50. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that: a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; b) the development is appropriately flood resistant and resilient; c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; d) any residual risk can be safely managed; and e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.
165	Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should: a) take account of advice from the lead local flood authority; b) have appropriate proposed minimum operational standards; c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and d) where possible, provide multifunctional benefits.

170 Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Appendix B. Non-Statutory Technical Standards for Sustainable Drainage

Flood risk outside the development
S1 Where the drainage system discharges to a surface water body that can accommodate uncontrolled surface water discharges without any impact on flood risk from that surface water body (e.g. the sea or a large estuary) the peak flow control standards (S2 and S3 below) and volume control technical standards (S4 and S6 below) need not apply.
Peak flow control
S2 For greenfield developments, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event should never exceed the peak greenfield runoff rate for the same event.
S3 For developments which were previously developed, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event.
Volume control
S4 Where reasonably practicable, for greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event should never exceed the greenfield runoff volume for the same event.
S5 Where reasonably practicable, for developments which have been previously developed, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event must be constrained to a value as close as is reasonably practicable to the greenfield runoff volume for the same event, but should never exceed the runoff volume from the development site prior to redevelopment for that event.
S6 Where it is not reasonably practicable to constrain the volume of runoff to any drain, sewer or surface water body in accordance with S4 or S5 above, the runoff volume must be discharged at a rate that does not adversely affect flood risk.
Flood risk within the development
S7 The drainage system must be designed so that, unless an area is designated to hold and/or convey water as part of the design, flooding does not occur on any part of the site for a 1 in 30 year rainfall event.
S8 The drainage system must be designed so that, unless an area is designated to hold and/or convey water as part of the design, flooding does not occur during a 1 in 100 year rainfall event in any part of: a building (including a basement); or in any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development.

S9 The design of the site must ensure that, so far as is reasonably practicable, flows resulting from rainfall in excess of a 1 in 100 year rainfall event are managed in exceedance routes that minimise the risks to people and property.

Structural Integrity

S10 Components must be designed to ensure structural integrity of the drainage system and any adjacent structures or infrastructure under anticipated loading conditions over the design life of the development taking into account the requirement for reasonable levels of maintenance.

S11 The materials, including products, components, fittings or naturally occurring materials, which are specified by the designer must be of a suitable nature and quality for their intended use.

Designing for maintenance considerations

S12 Pumping should only be used to facilitate drainage for those parts of the site where it is not reasonably practicable to drain water by gravity.

Construction

S13 The mode of construction of any communication with an existing sewer or drainage system just be such that the making of the communication would not be prejudicial to the structural integrity and functionality of the sewerage or drainage system.

S14 Damage to the drainage system resulting from associated construction activities must be minimised and must be rectified before the drainage system is considered to be completed.

Appendix C. Drainage Strategy Summary

1. Site details	
Site/development name	
Address including post code	
Grid reference	E N
LPA reference	
Type of application	Outline ☐ Full ☐ Discharge of Conditions ☐ Other ☐
Site condition	Greenfield ☐ Brownfield ☐

2. Existing drainage			**Document/Plan where information is stated:**
Total site area (ha)			
Impermeable area (ha)			
Final discharge location	Infiltration ☐ Watercourse ☐ Sewer ☐ Tidal reach/sea ☐		
Greenfield discharge rate (l/s) for existing site area	QBAR (l/s)		
	1 in 1 year (l/s)		
	1 in 30 year (l/s)		
	1 in 100 year (l/s)		
3. Proposed drainage areas			**Document/Plan where information is stated:**
Impermeable area (ha)	Roof		
	Highway/road		
	Other paved areas		
	Total		
Permeable area (ha)	Open space		
	Other permeable areas		
	Total		
Final discharge location	Infiltration ☐ Infiltration rate _____m/s Watercourse ☐ Sewer ☐ Tidal reach/sea ☐		
Climate change allowance included in design	20% ☐ 30% ☐ 40% ☐		

4. Post-Development Discharge rates, without mitigation			**Document/Plan where information is stated:**
Developed discharge rates (l/s)	1 in 1 year		
	1 in 30 year		
	1 in 100 year		
	1 in 100 year + CC		
5. Post-Development Discharge rates, with mitigation			**Document/Plan where information is stated:**
Describe development drainage strategy in general terms:			
(a) No control required, all flows infiltrating ☐			
(b) Controlled developed discharge rates (l/s)	1 in 1 year		
	1 in 30 year		
	1 in 100 year		
	1 in 100 year + CC		
6. Discharge Volumes			**Document/Plan where information is stated:**
	Existing volume (m^3)	Proposed volume (m^3)	
1 in 1 year			
1 in 30 year			
1 in 100 year			
1 in 100 year + CC			

All information presented above should be contained within the attached Flood Risk Assessment, Drainage Strategy or Statement and be substantiated through plans and appropriate calculations.

Form completed by	
Qualifications	
Company	
Telephone	
Email	
On behalf of (client's details)	
Date	

Appendix D. Drainage Asset Record Sheet for Verification Report

IDENTIFICATION	Type of Structure or Feature	
	Location Name	
	Drawing Identifier	
MANAGEMENT/ OWNERSHIP	Owners Name / Company	
	Address of owner	
	Owners Contact Number	
	Maintained By	
	Adoption proposed	☐ YES ☐ NO
	Name of Adopting Authority	
	Estimated Date of Adoption	
ASSET DETAILS	National Grid Reference (NGR)	
	Cover Level	
	Invert Level	
	Max volume	
	Height	
	Diameter/Width	
	Length	
	Depth	
	Designed Flow Rate	
	Any Additional Uses	